

Exhibit 10

Exhibit 10

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 1

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 * * * * *

4 LATIA ALEXANDER,)
 individually as heir of)
 5 ISAIAH T. WILLIAMS and in)
 her capacity as special)
 6 administrator of the Estate)
 of ISAIAH T. WILLIAMS,)

7)
 Plaintiff,)

8)
 vs.)

9) CASE NO.
 2:24-cv-00074-APG-NJK

10 LAS VEGAS METROPOLITAN)
 POLICE DEPARTMENT, a)
 political subdivision of)
 11 the State of Nevada; KERRY)
 KUBLA, in his individual)
 12 capacity, et al.,)

13 Defendants.)

14 _____)

15 VIDEOTAPED DEPOSITION OF

16 ADRIAN BEAS

17 30(b)(6) for Las Vegas Metropolitan

18 Police Department

19 Taken on March 28, 2025

20 at 9:04 a.m.

21 By a Certified Court Reporter

22 Las Vegas, Nevada

23

24 Stenographically reported by:
 Heidi K. Konsten, NV CCR 845, RPR
 25 JOB NO. 60239 - Firm No. 116F

1 Videotaped deposition of ADRIAN BEAS,
2 stenographically taken at 400 South Seventh Street,
3 3rd Floor, Las Vegas, Nevada, on Friday, March 28,
4 2025, at 9:04 a.m., before Heidi K. Konsten,
5 Certified Court Reporter in and for the State of
6 Nevada.

7

8 APPEARANCES OF COUNSEL

9 For the Plaintiff:

10 ADAM J. BREEDEN, ESQ.
11 Breeden & Associates, PLLC
12 7432 West Sahara Avenue
Suite 101
13 Las Vegas, Nevada 89117
(702) 508-9250
(702) 508-9365 Fax

14 For the Defendants:

15 CRAIG R. ANDERSON, ESQ.
16 Marquis Aurbach
10001 Park Run Drive
17 Las Vegas, Nevada 89145
(702) 382-0711
(702) 382-5816 Fax

18

Also present:

19

Vance Wharton, Videographer

20

21

* * * * *

22

23

24

25

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 3

1

INDEX

2

Page

3

ADRIAN BEAS

4

Examination by Mr. Breeden

5

5

* * * * *

6

7

EXHIBITS

8

No.

Description

Page

9

Exhibit 1

Notice of Deposition

11

10

Exhibit 2

SWAT manual excerpt -
Bates Numbers LVMPD
001490 through LVMPD
001491

98

11

12

Exhibit 3

Commission on Peace
Officer Standards and
Training Performance
Objective Reference
Material - Bates Numbers
Williams 000809 through
Williams 000810

114

13

14

15

16

Exhibit 4

Critical Incident Review
Team report excerpts -
Bates Numbers LVMPD
004440 through LVMPD
004443

168

17

18

19

* * * * *

20

21

22

23

24

25

1 LAS VEGAS, NEVADA

2 Friday, March 28, 2025

3 9:04 a.m.

4 DEPOSITION OF ADRIAN BEAS

5 * * * * *

6

7 THE VIDEOGRAPHER: Today is

8 March 28th, 2025. The time is approximately

9 9:04 a.m. Your court reporter is Heidi Konsten,

10 and I am your videographer, VN Wharton. We are

11 here on behalf of Lexitas.

12 The witness today is Lieutenant Adrian

13 Beas as a 30(b)(6) designee for Las Vegas

14 Metropolitan Police Department. And we are here

15 in the case Latia Alexander, individually, as heir

16 of Isaiah T. Williams and in her capacity as

17 special administrator of the estate of Isaiah T.

18 Williams, plaintiff, versus Las Vegas Metropolitan

19 Police Department, a political subdivision of the

20 State of Nevada, et al., defendants.

21 Will counsel please state your

22 appearances, and the court reporter will

23 administer the oath.

24 MR. BREEDEN: This is Attorney Adam

25 Breeden on behalf of the plaintiff.

1 MR. ANDERSON: Craig Anderson on
2 behalf of the defendants and the witness.

3
4 Whereupon,

5 ADRIAN BEAS,
6 was called as a witness, and having been first duly
7 sworn to testify to the truth, was examined and
8 testified as follows:

9
10 EXAMINATION

11 BY MR. BREEDEN:

12 Q Good morning, sir.

13 Can you please state your name for the
14 court reporter, and go ahead and spell your name
15 as well.

16 A It's Adrian Beas, A-D-R-I-A-N, B-E-A-S.

17 Q Okay. And, sir, are you currently a
18 lieutenant with the Las Vegas Metropolitan Police
19 Department?

20 A Yes, I am.

21 Q Okay. My name is Adam Breeden, and I'm
22 the attorney for Latia Alexander. She has filed a
23 lawsuit against the Las Vegas Metropolitan Police
24 Department and several of its SWAT officers
25 following a fatal shooting of her son, which

1 occurred on January 10th of 2022.

2 Do you understand the reason why you're
3 here this morning is to give deposition testimony
4 on behalf of the Las Vegas Metropolitan Police
5 Department in that case?

6 A Yes.

7 Q Okay. Have you ever given a deposition
8 before?

9 A No.

10 Q Okay. So given that it's your first
11 time, there's several rules for the deposition, or
12 we sometimes call them admonitions or -- or
13 instructions, regarding how we're going to proceed
14 today so we're on the same page.

15 First of all, understand that the oath
16 that was administered to you by the court reporter
17 is the same oath that you would take in a court of
18 law as if you were in front of a judge and a jury,
19 and it obligates you to tell the truth today under
20 penalty of perjury.

21 Do you understand that?

22 A Yes.

23 Q Your deposition is being videotaped
24 today, and that video may be played to the judge
25 or the jury if this matter goes to trial.

1 Do you understand that?

2 A Yes.

3 Q Okay. The court reporter to my left and
4 your right is taking down everything that's said
5 during today's deposition, all of my questions and
6 your answers and any other comments that are made
7 in the room. After the deposition is completed,
8 she will put all of those questions and answers in
9 a booklet or transcript form. You'll actually
10 have the right to review that transcript and make
11 changes to your testimony if you wish.

12 However, I would like to explain to you
13 in advance that if you say one thing here today
14 during your deposition and then later you try to
15 change your testimony in a meaningful or
16 substantive way, as opposed to just correcting a
17 typographical error or something of that nature,
18 that I would have the right to comment on the fact
19 that you said one thing during today's deposition
20 and then later you changed your testimony.

21 Do you understand that?

22 A Yes.

23 Q It is very important for us to make a
24 good record today, so there's several things I'll
25 ask you to do for me. First of all, if you don't

1 understand any of my questions, please ask me to
2 repeat or rephrase them, and I'll be happy to do
3 so for you.

4 During today's deposition, you need to
5 give an audible or verbal or out-loud response,
6 such as a "Yes" or a "No," as opposed to shaking
7 your head up and down or side to side or using
8 slang terms such as "Uh-huh" or "Huh-uh" if you
9 mean yes or no.

10 The reason I ask you to do that is
11 because those types of nonverbal responses or
12 slang responses, they don't show up well, if at
13 all, on the transcript. So during today's
14 deposition, it's very common for people the first
15 time they go through this process to say "Huh-uh"
16 or they just shake their head. I might ask you,
17 "Did you mean yes, or did you mean no?" because I
18 have to have something stated out loud on the
19 record for the court reporter.

20 Do you understand that?

21 A Yes, I do.

22 Q Additionally, you've done an excellent
23 job so far, but during today's deposition, as a
24 general rule, we have to avoid speaking at the
25 same time anyone else is speaking. We'll all

1 afford you the same courtesy. One of the reasons
2 we have to do that is it is very difficult for the
3 court reporter to accurately take down what two
4 people are saying at the same time.

5 So even if you believe you know the
6 answer to my question before I've completely
7 finished the sentence, please wait for me to
8 completely finish speaking before you begin your
9 response.

10 Can you do that for me?

11 A Yes.

12 Q During today's deposition, your
13 attorney, Mr. Anderson, may make an objection to
14 one or more of my questions. I want to explain to
15 you how objections work during the deposition
16 process, because they work a little differently
17 than what you may have seen on TV or in a
18 courtroom.

19 During a deposition, you can see we
20 don't have a judge here to immediately rule on
21 objections. So what we do during a deposition
22 is -- if I ask a question and Mr. Anderson wants
23 to make an objection for some reason, he will
24 state so on the record, and then we will still
25 look to you to give your response. And then,

1 later, if a judge needs to go back and look at the
2 transcript, he or she can do so and make a ruling
3 at that time based on the transcript whether your
4 response is admissible.

5 So I explain that to you because it
6 confuses many witnesses the first time. Sometimes
7 they think they hear an objection so they're not
8 supposed to respond, but generally the opposite is
9 true. If I ask you some question that is truly
10 protected by a privilege or there's some other
11 reason Mr. Anderson thinks you are not legally
12 obligated to respond to it, I'm sure he'll make
13 that very clear.

14 Otherwise, you can essentially ignore
15 the objections and just let Mr. Anderson state
16 them for the record, and then we'll -- we'll
17 continue with your response.

18 Do you understand how objections will
19 work today?

20 A Yes.

21 Q Okay. Have you consumed any alcoholic
22 beverages in the last 24 hours?

23 A No.

24 Q Have you taken any drugs -- that would
25 include prescription medications -- within the

1 last 48 hours?

2 A No.

3 Q Do you have any sort of medical
4 condition -- an extreme example would be dementia
5 or Alzheimer's disease -- that may affect your
6 memory or your ability to testify here today?

7 A I do not.

8 Q Okay. Your deposition or this
9 deposition was set today pursuant to Federal Rule
10 of Civil Procedure 30(b)(6), and that's a special
11 rule that says if we have sued a legal entity,
12 like the Las Vegas Metropolitan Police Department,
13 we can serve a list of topics, and then it's up
14 for the department to present a witness who is
15 educated about and can speak about those topics in
16 a manner that binds the police department.

17 So, to be clear on this transcript as we
18 begin, I did not specifically request that you
19 come here today to testify. You were -- you're
20 being presented on behalf of the police
21 department. So what we've done is we've taken the
22 deposition notice and we've marked it as
23 Exhibit 1. I will pass that to you.

24 (Exhibit 1 was identified.)

25

1 BY MR. BREEDEN:

2 Q And on page four of this exhibit,
3 there's a list of topics, and I've highlighted the
4 ones in yellow where you've been designated to
5 testify here today. So that was a long
6 introduction to this question.

7 But my question is: Prior to today's
8 deposition, have you reviewed this list of topics?

9 A I have.

10 Q And you are aware of the topics you've
11 been designated to testify today?

12 A Yes.

13 Q Okay. What, if anything, did you do to
14 prepare for the deposition? And when I ask that,
15 I mean, what documents have you reviewed? What
16 witnesses or defendants have you spoken to?
17 Explain to me what you've done.

18 A Well, first, Craig Anderson notified me
19 that I was going to do this deposition, so I've
20 met with Craig Anderson on two personal times at
21 his office, probably an hour or two each time.
22 We've had numerous phone calls, texting back and
23 forth regarding this case.

24 I've reviewed the CIRT report reference
25 Mr. Williams and this case. I've reviewed

1 depositions from Lieutenant O'Daniel,
2 Officer Bertuccini, Sergeant Russ Backman, and
3 Detective Roth. I've read the search warrants
4 related to the Nellis apartment, as well as Jimmy
5 Durante, the residence, and the IAP associated to
6 this.

7 I also reviewed reports regarding
8 Jasmine King case; reviewed past SWAT manuals
9 back -- dated back in 2021 -- prior to 2021, the
10 incident, the SWAT manuals as far as -- and as
11 well as the current SWAT manual; reviewed policy
12 on search warrants as it lies today in our policy.

13 Q Other than --

14 MR. ANDERSON: Body-worn camera.

15 THE WITNESS: Oh, I'm sorry. Reviewed
16 body-worn camera from multiple angles,
17 Sergeant Russ Backman, Officer Bertuccini, a
18 view -- a couple of different angles, but I
19 reviewed body-worn camera of that incident.

20 BY MR. BREEDEN:

21 Q Okay. In preparing for the deposition,
22 did you review any documents or find any documents
23 that you believe had not already been produced in
24 this case?

25 A I did not.

1 Q Okay. And --

2 A Can -- can I ask for a tissue?

3 MR. ANDERSON: Yeah, tissue.

4 THE WITNESS: I'm sorry.

5 MR. BREEDEN: Sure. Well, let's go
6 off the record briefly.

7 THE VIDEOGRAPHER: The time is
8 9:15 a.m. We are off the record.

9 (Whereupon, a recess was taken.)

10 THE VIDEOGRAPHER: The time is
11 9:17 a.m. We are on the record.

12 BY MR. BREEDEN:

13 Q Okay. So, Lieutenant Beas, we're back
14 on the record now.

15 Other than reviewing other depositions
16 that were taken in this case, did you have any
17 personal conversation with any of the Metro police
18 officers who have been sued individually?

19 A I have. Previous to this, back when I
20 took over the SWAT team, I did have conversations
21 regarding this incident. It's just something you
22 learn from. So I've spoken with
23 Officer Bertuccini, Officer Jake Warner, Russ
24 Backman. Those are the three main -- Sergeant
25 Alex Gonzales, Chris Latham. Those are about the

1 main ones I can remember that were involved in
2 that incident. Kerry Kubla -- I mean, obviously.
3 They all work for me.

4 Q Okay. And is it fair to say, though,
5 that you had no personal involvement in the
6 planning or execution of this SWAT action on
7 the -- on January 10 of 2022 at the time that it
8 happened?

9 A I did not.

10 Q Okay. Were you on Las Vegas' SWAT team
11 or in the SWAT department at all at that time?

12 A I was not.

13 Q Okay. So -- and we're going to get into
14 your employment here in just a second or two,
15 so --

16 Have you reviewed any expert reports
17 that have been produced in this litigation?

18 A Other than those reports that I just
19 stated, no other reports.

20 Q Okay. And, I mean, just to clarify,
21 there's been police practices experts. We have
22 produced reports by a Greg Gilbertson, as well as
23 a former Metro SWAT member whose -- whose name,
24 for some reason, I can't come up with right now.

25 MR. ANDERSON: Tom Milton.

1 BY MR. BREEDEN:

2 Q Tom Milton.

3 Have you reviewed those reports?

4 A I did not.

5 Q Okay. Do you know Mr. Milton, by the
6 way?

7 A I do.

8 Q Okay. Did you know him personally from
9 his time on the police force?

10 A I knew him personally from the police
11 force, just from interactions on the department.

12 Q Okay. Was he -- would you call him a
13 friend or a personal acquaintance of yours?

14 A I would say a work acquaintance.

15 Q Okay. And then there's been a defense
16 police practices expert also produced. And,
17 again, for some reason, I can't come up with that
18 gentleman's name.

19 MR. ANDERSON: Spencer Fomby.

20 BY MR. BREEDEN:

21 Q Spencer Fomby.

22 Have you reviewed Mr. Fomby's report?

23 A I did not.

24 Q Have you spoken to Mr. Fomby?

25 A I don't know who he is.

1 Q Okay. Well, let's -- let's talk a
2 little bit about your background and experience
3 with Las Vegas Metro.

4 First of all, what is your current title
5 or rank?

6 A My current rank is a lieutenant on the
7 Las Vegas Metropolitan Police Department, and I'm
8 currently assigned to the SWAT section as the
9 tactical commander.

10 Q And are you essentially the second in
11 command at SWAT?

12 A Yes. I have a captain who is above me
13 who is the SWAT commander.

14 Q Okay. And who is the current captain?

15 A Hector Cintron, C-I-N-T-R-O-N.

16 Q How long has Captain Cintron been the
17 SWAT captain?

18 A I believe he came on around October of
19 last year.

20 Q And how long have you been the -- would
21 you say it's the -- the tactical lieutenant?

22 A Tactical commander, yeah.

23 Q Tactical commander.

24 A Same -- same thing.

25 Q How long have you been the tactical

1 commander or lieutenant, then, at SWAT?

2 A I took over officially July 8th of 2023.

3 Q And so let's get a little bit of an idea
4 about your background then.

5 What's the extent of your education?

6 A I have an associate's degree at the
7 College of Southern Nevada in criminal justice.

8 Q What year did you obtain that degree?

9 A I believe it was 2003.

10 Q Have you lived in Clark County, Nevada,
11 your whole life?

12 A I have.

13 Q And when did you first join Las Vegas
14 Metro?

15 A I joined Las Vegas Metro on July 27th of
16 1998.

17 Q Have you been continuously employed with
18 Metro since 1998?

19 A I have.

20 Q And, you know, we'll just say as an
21 adult -- and I realize that's a little vague, but
22 as an adult, have you always worked as a police
23 officer, or have you held other positions?

24 A Prior to 1998, I joined the United
25 States Marine Corps in 1994 after graduating high

1 school. I served four years in the Marine Corps.

2 Q Okay. So I'm just trying to -- to get a
3 timeline here. It sounds like you graduated high
4 school. You went into the Marine Corps for four
5 years. After leaving the Marine Corps, you joined
6 Metro.

7 And then, apparently, while you were
8 employed by Metro, you were also getting a
9 criminal justice degree?

10 A Yes, I started College of Southern
11 Nevada as a -- already employed with Metro. In
12 between the United States Marine Corps, I worked
13 at the MGM as a security guard/EMT for two months
14 waiting to get hired on to Metro.

15 Q When you were in the Marines, were you
16 military police?

17 A I was a firefighter.

18 Q When you were first hired by Metro, what
19 department or what assignment did you receive?

20 A When I started Metro in 1998, after the
21 academy, after field training, I was in patrol. I
22 finished field training, and I was stationed at
23 Northeast Area Command as a patrol officer.

24 Q And so it might be easier just -- just
25 for you to explain it, but why don't you give me

1 an idea of your advancement through the department
2 up until the time that you became a lieutenant for
3 the SWAT team.

4 A Okay. Like I said, 1998, graduated the
5 academy in December, started field training, and
6 then I worked patrol officer. Became an FTO,
7 field training officer, at the Northwest Area
8 Command. In 2000 -- I believe it was '4, I became
9 a detective in the vice unit. I was a vice
10 detective. In 2007, I left the vice unit and went
11 to the surveillance section.

12 In 2008, November 1st, I was promoted to
13 sergeant and worked Bolden Area Command as a
14 graveyard sergeant. I believe in 2012, I went
15 back to the vice section as a sergeant. I moved
16 to the -- it was then called career criminal
17 repeat offenders program, which is now called
18 major violators section, as a sergeant in 2014.

19 A couple of years later, 2017, I went to
20 the narcotics section, where I worked the FBI Safe
21 Street gang task force. Stayed in narcotics until
22 I promoted in 2019 as a lieutenant and became a
23 watch commander in June of 2019. In February of
24 '20, I was moved to the counterterrorism section
25 as the lieutenant. In December of '22, I moved

1 to -- to the major violators section as a
2 lieutenant. And then in July of '23, I took over
3 as tactical commander of the SWAT team.

4 Q Who was the prior tactical commander for
5 SWAT that you took over for?

6 A His name was Lieutenant Joey Herring.

7 Q Is Lieutenant Herring still with the
8 force?

9 A He is -- he retired.

10 Q And then, to your knowledge, prior to
11 Lieutenant Herring, was it Lieutenant O'Daniel who
12 was the SWAT lieutenant tactical commander?

13 A Yes, she was.

14 Q Okay. And Lieutenant O'Daniel also
15 retired; right?

16 A Yes.

17 Q When did she retire?

18 A I believe December -- sometime late '22
19 or early '23. I believe Joey took over in
20 December of -- or January of '23.

21 Q Have you ever been sued personally or
22 individually as a result of your employment at
23 Las Vegas Metropolitan Police Department?

24 A I was taken to -- I don't know if it was
25 sued, but it was a diversity issue.

1 Q Have you ever had use-of-force
2 complaints made against you?

3 A No.

4 Q Did you ever go on the SWAT missions
5 prior to being promoted to tactical commander?

6 A Starting in May of '23, I started to
7 ride along with SWAT, shadowing Lieutenant Joey
8 Herring. So I would go on search warrants and
9 callouts, shadowing him as the tactical commander,
10 but not as an operator.

11 Q Would you do -- I mean, SWAT and major
12 violators probably worked together on occasion.

13 Would you go on SWAT as part of major
14 violators?

15 A Major violators, when -- sorry, when I
16 was in major violators as a sergeant and as a
17 lieutenant, we were mostly -- I won't say mostly,
18 but we did all the time -- it was either a PC
19 arrest or an arrest warrant for a subject, which
20 is totally opposite of search warrants for the
21 residence to search a place. But we would deal
22 with SWAT frequently if a suspect or a subject
23 would not leave their residence.

24 Q Have you ever been one of the SWAT team
25 members in the line, though, so to speak? In

1 other words, doing the entry?

2 A No, I was never an operator.

3 Q Okay. And just to talk a little bit
4 about some of the individual defendants, you know
5 Kerry Kubla; correct?

6 A I do.

7 Q Is he still on your SWAT team?

8 A He is.

9 Q Okay. Is he someone that you see
10 frequently at work, then?

11 A I work with Kerry Kubla, I believe,
12 three of his four days.

13 Q Okay. And then Officer Brice Clements,
14 is he still on SWAT?

15 A He is not.

16 Q Okay. Why is he not on SWAT any longer?

17 A I do not know. He left prior to myself
18 getting up there.

19 Q Is he still on the force?

20 A Oh, I'm sorry. I think Brice promoted
21 out of the SWAT.

22 Q Okay. Do you know what department he's
23 with, then?

24 A He's in patrol. He's on a patrol squad.

25 Q Okay. Is he somebody that you -- you

1 have spoken to in the past?

2 A I've said hi to him a few times, and
3 that's about the extent of my talk with him.

4 Q But he's somebody, if he walked into
5 this room, you would recognize him?

6 A I would, yes.

7 Q Okay. Alex Gonzales -- is
8 Officer Gonzales still on SWAT?

9 A Yeah, Alex promoted to sergeant, and he
10 is now a team leader on the SWAT team.

11 Q Okay. And so he's somebody that you see
12 frequently and work with frequently at work?

13 A Again, I work with him three days of his
14 four days.

15 Q Okay. Russell Backman.

16 A Russell Backman retired a few months
17 ago, and then Sergeant Alex Gonzales took his
18 spot.

19 Q Okay. And so Russell Backman is no
20 longer with the force, but did he retire while he
21 was on SWAT?

22 A He did.

23 Q Okay. So he was somebody, at least for
24 a period of time, you worked with as well?

25 A Exactly.

1 Q Okay. And he's somebody, if he walked
2 in here, you would recognize him?

3 A I've known Sergeant Russ Backman since
4 we were in vice, detectives together, so I've
5 known him for a long time.

6 Q Is that more than 15 years, then?

7 A Yes.

8 Q Okay. James Rothenburg -- is
9 Officer Rothenburg still on SWAT?

10 A He is not.

11 Q Okay. When did he depart SWAT?

12 A I couldn't tell you. I know he promoted
13 as a sergeant and went back to patrol.

14 Q Okay. So he's a patrol sergeant now?

15 A I do not know where he's located --
16 where his duties are now, but ...

17 Q Okay. And then Officer Bertuccini -- is
18 he still on SWAT?

19 A Yes, he is.

20 Q Okay. And is he somebody, then, that --
21 that you work with frequently at Metro?

22 A Yes.

23 Q Okay. And then Lieutenant O'Daniel, my
24 understanding is she's retired now; correct?

25 A She is.

1 Q Is she somebody, when she worked for the
2 force, you knew her?

3 A Yes.

4 Q Okay. So if she walked in here today,
5 you would recognize her as well?

6 A Yes.

7 Q Okay. Have you had any discussions with
8 her specifically about what happened with either
9 the Jasmine King or the Isaiah Williams matters?

10 A No, not at all.

11 Q Okay. To your knowledge, have any of
12 those individual defendants been disciplined or
13 received any sort of retraining as a result of
14 what happened in Mr. Williams' matter?

15 A Through the reports that I've read, I do
16 not believe any of them were disciplined
17 internally for this incident.

18 Q And, in fact, as you just testified,
19 several of them have been promoted, despite the
20 incident; right?

21 A Yes.

22 Q As part of your job with Las Vegas
23 Metro, have you testified in court before?

24 A Yes, I have.

25 Q How many times?

1 A In front of a jury, at least two times.

2 Not more than three or four.

3 Q Okay. And those were instances where
4 you or Metro was not being sued; those are in
5 association with a criminal investigation?

6 A It was.

7 Q Okay. It seems like you remembered two
8 occasions pretty clearly.

9 Can you describe those to me?

10 A The first occasion I remember was my
11 first time. It was reference a -- a subject that
12 had connected his ex-girlfriend at her home, took
13 her in a vehicle, and it became a vehicle pursuit
14 that went out to Indian Springs and ended in an
15 accident where they rolled over, and he was
16 arrested for kidnapping, and I was the arresting
17 officer.

18 Q And what's the second occasion you're
19 thinking of?

20 A The second occasion is when I was a vice
21 detective and we arrested a subject for pandering.

22 Q Have you ever testified in court
23 relating to a SWAT action?

24 A No.

25 Q What involvement do you have with

1 training SWAT officers?

2 A As the tactical commander, I oversee
3 everything from day to day that happens in the --
4 the SWAT section. As part of the section, we have
5 a -- a squad that's called a training section, and
6 it's led by a sergeant, Sergeant Brett Brosnahan,
7 and three operators.

8 These three operators are senior
9 officers that have shown the ability -- not only
10 the experience and knowledge, but the ability to
11 also teach. And they are responsible for all
12 training to all of our operators. And this is --
13 includes SWAT school, weekly training, all of the
14 lesson plans to make sure they're current,
15 teaching lesson plans, and coming up with new
16 training based on new things that we see
17 throughout the year.

18 Q And do you personally teach any of those
19 classes?

20 A I do not.

21 Q Okay. That's left to Sergeant Brosnahan
22 and others?

23 A And his team, yes.

24 Q Okay. Do you take part, though, in
25 changing or updating the instruction?

1 A Yes. Since I have been tactical
2 commander, we have created a leadership team.
3 It's composed of the SWAT commander, myself, all
4 four team leaders, all four assistant team
5 leaders, and the training section.

6 If we see that there's a new way of
7 doing things, a new tactic, a new tool, a new
8 piece of equipment, we talk about it as a group,
9 and it's -- through a committee, we either agree
10 to adopt that new tactic, buy that new piece of
11 equipment, or buy that new piece of -- a vehicle
12 or something like that.

13 So myself and the SWAT commander have
14 the final say in if we're going to move that
15 direction.

16 Q So part of what you do as the tactical
17 commander for SWAT, though, is to review the
18 instruction to make sure it's adequate; right?

19 A Yes.

20 Q Okay. When we talk about standards and
21 training for SWAT, would you agree with me that
22 there are department standards, then there are
23 state or national standards, and then there's
24 constitutional standards? Do you agree with that?

25 A As in tactics or in, like, laws?

1 Q Just -- yeah, generally speaking,
2 regarding policies for SWAT and how SWAT actions
3 are to be conducted.

4 A I could agree with you.

5 Q Okay. And you agree with me that all
6 Metro's policies need to comply with the
7 United States Constitution; correct?

8 A Correct.

9 Q And they need to comply with the Nevada
10 state constitution as well; right?

11 A Correct.

12 Q They need to comply with Nevada state
13 law as well; right?

14 A Correct.

15 Q And then there are some national or --
16 or state standards.

17 Are you familiar with Nevada POST?

18 A I am.

19 Q Okay. Would you consider that to be an
20 organization that is reliable in the standards
21 that it's published?

22 A It oversees our certification as law
23 enforcement officers, so yes.

24 Q Are Metro's department policies required
25 to comply with POST?

1 MR. ANDERSON: Objection. Form.

2 Go ahead and answer.

3 THE WITNESS: I believe -- I don't --
4 I couldn't answer. I don't know if they have to
5 require to -- everything POST says, because POST
6 is a standard of law enforcement training and
7 standardization, so I do not meet the -- I don't
8 know if they meet the threshold for state law or
9 U.S. law.

10 BY MR. BREEDEN:

11 Q Yeah. So let -- so let me phrase it
12 this way.

13 Is it your understanding that Nevada
14 POST, if they publish some sort of a training, is
15 that a recommendation or a requirement that Metro
16 follow that?

17 A A requirement.

18 Q Okay.

19 A As far as training hours.

20 Q So you think it's -- so you think it's
21 mandatory?

22 A I don't believe everything that POST
23 publishes is mandatory, but it's a -- it's a
24 threshold.

25 Q Okay. Well, what -- what do you mean

1 by -- by "threshold"?

2 A Like --

3 Q Do you mean that it -- that the
4 department's policies should at least meet POST's
5 policies?

6 A At least meet the POST policies, yes.

7 Q Okay. So I would say, then, that what
8 you're describing is that Metro's policies, in
9 your opinion, should be at least as -- they should
10 require at least as much as Nevada POST, and they
11 can even exceed that. Is that what you're saying?

12 MR. ANDERSON: Objection. Form.

13 Go ahead.

14 THE WITNESS: Yes.

15 BY MR. BREEDEN:

16 Q Okay. And then let's see here.

17 So in terms of constitutional standards,
18 does Metro provide its SWAT officers any
19 instruction on particular court cases and
20 requirements from those decisions?

21 A In search warrant planning and tactical
22 planning, we do cover some case law that regards
23 to search warrants and U.S. law and -- and state
24 law.

25 Q Okay. We're going to talk about some

1 specific cases a little later in your deposition,
2 but I want to ask you -- you know, you're the SWAT
3 tactical commander -- are you familiar with the
4 United States Supreme Court case of Wilson v.
5 Arkansas?

6 A I am.

7 Q Okay. And so can you generally describe
8 what that case discusses?

9 A The -- it's a case that kind of cements
10 the knock and announce -- the announcement of the
11 police to the property, the defendant, from a
12 common law to actually a case law -- to give them
13 a reasonable amount of time to submit, given
14 the -- their -- their authority and position of
15 the officers before the search warrant.

16 Q Is there anything -- well, it's before
17 force can be used to enter when serving a warrant;
18 right?

19 A Correct.

20 Q Okay. And that case actually says that
21 that is a constitutional requirement under the
22 Fourth Amendment; right?

23 A Yes.

24 Q Okay. There's some decisions applying
25 Wilson v. Arkansas from the Ninth Circuit Court of

1 Appeals. One of them is United States v.
2 Granville.

3 Are you familiar with that case?

4 A Not offhand.

5 Q Okay. There's another case called
6 United States v. Banks.

7 Are you familiar with that case?

8 A I am, because it's a -- it's a North
9 Las Vegas case and -- yes, I'm familiar with that.

10 Q Okay. And what's your understanding,
11 just to describe it to a layperson, what that case
12 discusses?

13 A Again, it goes to announcing your
14 authority and purpose prior to making forcible
15 entry. In U.S. v. Banks, they went on to describe
16 timing of reasonableness for that specific case.

17 Q Okay. In the training that's provided
18 to SWAT officers, is Wilson v. Arkansas ever
19 specifically mentioned or cited in the training?

20 A Yes, and it's also in our policy manual.

21 Q Okay. And is United States v. Granville
22 specifically mentioned?

23 A I don't recall.

24 Q Is United States v. Banks specifically
25 mentioned?

1 A I don't believe so prior to this
2 incident. It has been recently, though.

3 Q Okay. So prior to January 10 of 2022,
4 to your knowledge, training that Metro gave SWAT
5 did not specifically include United States v.
6 Banks?

7 A I couldn't be 100 percent, but the
8 documents that I've been reviewing prior to this
9 case, I can't find U.S./Banks.

10 Q Okay. And just generally speaking,
11 would you agree with me that for Metro to
12 effectively train its SWAT officers on knock and
13 announce, it should be training them on the major
14 court decisions that they have to comply with?

15 MR. ANDERSON: Objection. Form.

16 Go ahead and answer.

17 THE WITNESS: They should be trained
18 on everything that's associated with knock and
19 announce and search warrants, correct.

20 BY MR. BREEDEN:

21 Q And would you agree with me that, at
22 least in that respect, prior to the incident in
23 this case, Metro failed in that job?

24 MR. ANDERSON: Objection. Form.

25 THE WITNESS: I can't say that they

1 failed, because -- just because it's not
2 documented, I can't -- I can't speak to the fact
3 that it wasn't informally talked about, because it
4 is a local case and I'm sure the -- the tactical
5 commander -- well, they would know that and talk
6 with that. But I just -- in my research, I could
7 not find that in previous formal documents.

8 BY MR. BREEDEN:

9 Q Okay. There's no evidence in writing
10 that there was instruction given; correct?

11 A Correct.

12 Q Okay. And would you agree with me,
13 then, that if it -- in the verbal instruction as
14 well, there was no instruction on those cases,
15 that would be a failure of training?

16 MR. ANDERSON: Objection. Form.

17 THE WITNESS: I don't know if it would
18 be a complete failure of training, as -- as long
19 as they're touching parts that are -- that are
20 critical to the search warrant with U.S. and
21 Nevada state law.

22 BY MR. BREEDEN:

23 Q Okay. I'm going to skip around a little
24 bit -- well, look, I don't want to dwell on this
25 subject.

1 But as you sit here today, you can't
2 tell me any of that training occurred, can you?

3 A I do know that they discuss in the
4 search warrant planning and tactical planning case
5 law. I can't find documentation of every single
6 incidence, what they were trained of, but there is
7 lesson plans that cite certain cases, Wilson v.
8 Arkansas being one of them. I'm sorry, the --

9 Q Yeah, but -- but you yourself aren't
10 even familiar with United States v. Granville, and
11 you can't find anything in the training materials
12 that specifically mentions United States v. Banks
13 either; correct?

14 A Prior to this incident, no.

15 Q Prior to this incident. Okay.

16 I'm going to skip around in the topics
17 just a little bit here.

18 First of all, when we talk about
19 warrants and how warrants are to be served, we
20 have no-knock warrants and then other warrants,
21 which I guess you could call regular warrants, or
22 knock-and-announce warrants.

23 What -- what term would you use for
24 that?

25 A For other warrants that are not no-knock

1 warrants?

2 Q Correct.

3 A Well, just to go back a little bit,
4 they're all search warrants in a sense. They're a
5 search warrant signed by a judge, approved by a
6 district attorney, written by a detective or an
7 officer. When we get those search warrants, if
8 they specifically requested a no-knock search
9 warrant, that's just a tactic that the SWAT team
10 uses in serving those search warrants.

11 So I would say a no-knock search warrant
12 is -- it's different in a case, because it gives
13 us authority to not knock and announce our
14 presence prior to making forcible entry. But
15 those would be tactics in serving a search
16 warrant. So if you're asking specifically about
17 tactics, we do have different tactical options in
18 serving search warrants.

19 Q Okay. So one of those tactics is a
20 no-knock warrant; correct?

21 A Correct.

22 Q And you agree that the warrant in this
23 particular case was not a no-knock warrant.

24 A It was not a no-knock warrant, correct.

25 Q Okay. So it was a warrant that had to

1 be served according to the knock and announce
2 rule?

3 A Correct.

4 Q Okay. And so what does the knock and
5 announce rule actually require of officers? Like,
6 if you'll just regurgitate for me the -- the legal
7 definition of it.

8 A Again, prior to making forcible entry,
9 the SWAT officers or officers in general have to
10 announce their presence and authority and purpose
11 to the occupants in that dwelling, and they have
12 to fail to surrender prior to making forcible
13 entry.

14 Q Okay. Do you agree with me that one of
15 the requirements of the knock and announce rule is
16 to knock?

17 A I do not agree with you on that.

18 Q Do you agree one of the requirements is
19 that the police announce their presence and
20 purpose -- purpose meaning, for example, to serve
21 a search warrant?

22 A Yes.

23 Q And then do you agree with me that one
24 of the requirements of knock and announce is that
25 Metro wait a reasonable amount of time for persons

1 inside the residence to come to the door,
2 ascertain the officers' identity and purpose, and
3 allow them entry?

4 A SWAT officers should wait a reasonable
5 amount of time, yes.

6 Q Okay. And officers are required to
7 comply with knock and announce before forcefully
8 entering a residence; correct?

9 A They have to comply with the knock and
10 announce law by reasonably giving them
11 announcements, reasonably giving them time before
12 the forcible entry, yes.

13 Q Okay. Based on the court decisions,
14 what is the rationale behind requiring the knock
15 and announce rule?

16 MR. ANDERSON: Objection. Form.
17 Go ahead and answer.

18 THE WITNESS: It goes back to common
19 law of just announcing our presence prior to
20 making forcible entry so they know we have a
21 lawful search warrant.

22 BY MR. BREEDEN:

23 Q Okay. Does Metro consider one of the
24 reasons behind that rule to reduce the risk of
25 harm to both the officers and the occupants inside

1 the residence when the warrant is served?

2 A Those are two main factors, and the
3 third would be the citizens around there.

4 Q Okay. Are there certain factors -- you
5 know, when we talk about a reasonable amount of
6 time for officers to wait under the knock and
7 announce rule, are there certain factors that
8 affect what the officer should consider to be
9 reasonable?

10 A Oh, there's several factors. It could
11 fluctuate your reasonableness of time.

12 Q Can you explain those factors to me?

13 A Size of the -- the structure; the area
14 of where it's presented, if it's a tight apartment
15 complex, townhomes, also if it's in a rural area;
16 subjects inside, if you know they could be armed
17 or violent; proximity to citizens; the ability to
18 contain the structure; belief that evidence could
19 be destroyed. Those are -- those of some of the
20 factors.

21 Q Okay. And I don't think -- there's one
22 that I don't think you mentioned, which is the
23 time of day that the warrant is served.

24 A Oh.

25 Q Do you --

1 A Time of day could affect reasonableness
2 of time.

3 Q Okay. You agree with that as well?

4 A Yes.

5 Q Okay. And does Metro agree that knock
6 and announce is required by the Fourth Amendment
7 to the United States Constitution?

8 A Is a requirement by the U.S.
9 Constitution?

10 Q Yes.

11 A Correct, yes.

12 Q And then are you familiar with NRS
13 Section 179.055?

14 A I am. That's the NRS that governs
15 search warrants and the service of search
16 warrants.

17 Q And so does that Nevada state law also
18 incorporate the knock and announce rule?

19 A It does.

20 Q Okay. And, in fact, it requires -- I'll
21 just read it to you. It says, quote, "The officer
22 may break open any outer or inner door or window
23 of a house or any part of the house or anything
24 therein to execute the warrant if, after notice of
25 authority and purpose, the officer is refused

1 admittance," end quote.

2 So Nevada state law actually uses the
3 phrase that officers must be "refused admittance."

4 Do you understand that?

5 A I do.

6 Q Okay. And do you believe that
7 requirement under state law, the refusal of
8 admittance, do you believe that is essentially the
9 same as the Fourth Amendment's knock and announce
10 rule, or do you believe that that is a -- is a
11 greater protection?

12 MR. ANDERSON: Objection. Form.

13 Go ahead and answer.

14 THE WITNESS: It's essentially the
15 same, but they just structure it and word it
16 different, the -- or the submitting.

17 BY MR. BREEDEN:

18 Q Okay. So it's Metro's position that
19 there's no practical difference between the state
20 law and the federal knock and announce rule?

21 A The state law is more restrictive than
22 the -- the U.S. law.

23 Q How is it more restrictive?

24 A But putting those words in there of
25 actually submitting -- or, I'm sorry, failure

1 to -- what was the exact --

2 Q It would be the officer's refused
3 admittance.

4 A Refused admittance. The actual verbiage
5 of refused admittance.

6 Q Okay. And in Metro's position, what is
7 necessary to establish that the officer has been
8 refused admittance?

9 A Refused admittance could be many
10 factors. It could be a suspect looking out a
11 window and not opening the door during the
12 announcements. It could be you hearing noises
13 inside that you know -- you hear movements. Or it
14 could simply just be nobody is at the door,
15 opening the door, submitting to your request of --

16 Q Well, if it just meant nobody was at the
17 door, then that refusal of admittance requirement
18 wouldn't mean anything; right? That would --
19 under that construction, Metro could just burst
20 through any door where somebody wasn't standing
21 right there to -- to open it. So it must mean
22 something more than that.

23 A I believe you still have to give a
24 reasonable amount of announcements, because there
25 could clearly not be anybody home during the

1 service of the search warrant and then no door
2 open, but equal to be somebody could be inside
3 fortifying their position or becoming armed or
4 destroying evidence and not opening the door or
5 looking out a window.

6 Q When we talk about SWAT tactics, what is
7 a CET?

8 A CET is a controlled entry tactic.

9 Q And so what -- what does that mean?

10 A That's essentially -- it's a type of
11 service, a tactic during a search warrant. It's a
12 dynamic search warrant. It's where they get
13 information. Again, it has to fit the criteria
14 based on size, suspects, crime.

15 There's numerous factors that -- if the
16 CET tactic is approved to use. They establish
17 containment. They establish the announcing of the
18 search warrant prior to them making forcible entry
19 if that's needed. And once forcibly -- forcibly
20 entering or a door is opened, an entryway is
21 opened, they flood that structure, and they take
22 it room by room to overwhelm that structure to
23 make it safe for the service of the search
24 warrant.

25 Q The very concept behind a CET entry is

1 that SWAT is supposed to use surprise and
2 overwhelming force in entering the structure;
3 correct?

4 A Speed, surprise, and overwhelming
5 action, yes.

6 Q And so given that CET requires speed,
7 surprise, and overwhelming action, whereas the
8 knock and announce rule requires that officers
9 wait a reasonable amount of time after they've
10 announced their presence for somebody to come to
11 the door and allow them entry, does Metro consider
12 CET to be in conflict with the knock and announce
13 rule?

14 A After this incident, they did see that
15 there was a conflict in the language of the CET
16 based on the reasonableness of time.

17 Q Okay. And so it took this incident for
18 Metro to realize that?

19 A I don't think it was just this incident.
20 It was various incidents throughout the U.S.
21 during that time period, very high profile cases
22 with SWAT and search warrants. There was a new --
23 I guess a law expert that was hired by Las Vegas
24 Metropolitan Police Department that agreed that it
25 was in conflict and made recommendations, as well

1 as CIRT recommendations. The new sheriff, as well
2 as the new director of SWAT, changed that
3 language.

4 Q Okay. But it wasn't because the knock
5 and announce rule or how it was defined changed.
6 It's just that Metro had a policy in place, and
7 then, as a result of this incident, it realized
8 it's -- the CET policy was not in compliance with
9 knock and announce; correct?

10 MR. ANDERSON: Objection. Form.

11 THE WITNESS: Yeah, that CET was in
12 place for 20-plus years. It was a tried and true
13 method of a tactical that -- it was a national
14 standard through National Tactical Officers
15 Association, through numerous SWAT teams that used
16 it on a daily basis, and Las Vegas Metropolitan
17 Police Department used it thousands of times.

18 And, yes, this incident, as well as
19 other incidents that the Metropolitan Police
20 Department was involved in, they took a look at
21 it: Is there a better way that we can do things?
22 And just like anything in policing, they want to
23 take a look. It doesn't mean it's a violation of
24 any law. It's just could we do something better
25 to protect the citizens of Las Vegas, the

1 officers, and/or the suspects that we deal with.

2 And at this case, they took a look at,
3 based on recommendations by CIRT and Anthony
4 Bandiero -- I can't -- I don't know if I'm saying
5 his name right -- to change the tactic based on
6 the language that we're using, the speed,
7 surprise, and overwhelming action, to make that a
8 no-knock search warrant.

9 BY MR. BREEDEN:

10 Q Yeah, so CET should only be used on a
11 no-knock warrant; is that correct?

12 MR. ANDERSON: Objection. Form.

13 Are you talking about Fourth Amendment
14 or policy?

15 MR. BREEDEN: Well, we can break it
16 down.

17 BY MR. BREEDEN:

18 Q So under department policy, is it true
19 that CET should only be used on a no-knock
20 warrant?

21 A As it currently sits today, we actually
22 took the -- we call it a dynamic search warrant,
23 but it's essentially the same as a CET. It can
24 only be used if we have a no-knock search warrant,
25 and that's based on police policy, our

1 department's policy, not on case law.

2 Q And so the next question, then, is: Is
3 it the department's position that under the Fourth
4 Amendment, CET entry as it was being used by Metro
5 conflicted with the knock and announce rule?

6 MR. ANDERSON: Objection. Form.

7 Go ahead and answer.

8 THE WITNESS: I think they could not
9 come to a full agreement. The -- the CET still
10 complied with the knock and announce rule as far
11 as service of the search warrant. The tactic,
12 again, was used for 20-plus years.

13 After reviewing this incident, they
14 started looking into national trends, national
15 SWAT teams changing their tactics. Hundreds of
16 SWAT teams have changed their tactics going away
17 from the CET or dynamic search warrants to a more
18 what we would call "surround and call out" or a
19 modified CET.

20 When that consultant said that the
21 language of speed, surprise, and overwhelming
22 action conflicted with giving reasonable
23 announcements, the department took that and asked
24 us to change it. But it took, I would say, at
25 least a year after that CIRT report to -- to

1 finally make that change, and it was through a new
2 director, a new sheriff, and a new tactical
3 commander that it changed.

4 BY MR. BREEDEN:

5 Q Okay. So just to sort of summarize
6 here, after this incident, there was an
7 investigation of what occurred and whether there
8 was a failure in policy; correct?

9 A Correct.

10 Q Specifically as it pertained to CET
11 entry and whether CET entry complied with state
12 and federal knock and announce requirements;
13 correct?

14 A Correct.

15 Q There was a legal consultant who was of
16 the opinion that it did not; correct?

17 A He stated that the language used in that
18 policy conflicted with the -- the knock and
19 announce reasonableness of time.

20 Q And then the critical incident review
21 team, or CIRT, came to the same conclusion;
22 correct?

23 A Yes, but the basis of it is -- is the
24 actual language of speed, surprise, and
25 overwhelming action. It's not the tactic itself.

1 Q Okay. Well, speed, surprise, and
2 overwhelming action was used to enter the
3 apartment where Mr. Williams was on January 10th
4 of 2022; correct?

5 A Correct, the CET was used.

6 Q Okay. And then the CIRT findings were
7 also reviewed by the tactical review board or the
8 TRB; correct?

9 A Correct.

10 Q And TRB agreed with CIRT's findings;
11 correct?

12 A Correct.

13 Q Okay. And so is Metro today taking a
14 position that, for some reason, the tactical
15 review board and the CIRT review and the CIRT team
16 were incorrect in their conclusions?

17 MR. ANDERSON: Objection. Form.

18 THE WITNESS: What we agreed upon,
19 that the CIRT recommendations that keeping the
20 language of speed, surprise, and overwhelming
21 action, that tactic would be a no-knock search
22 warrant.

23 BY MR. BREEDEN:

24 Q In the SWAT world, what is a SACO
25 technique?

1 A SACO, SACO, surround and call out.

2 Q Okay. And so what does that mean, and
3 how is it different from a CET?

4 A A SACO is, again, another tactic used in
5 service of a search warrant. If -- if a -- a
6 tactic of CET is not authorized or doesn't fit,
7 based on some of the criteria I spoke about
8 earlier about the size of the property, the
9 suspects, the crime, what we're going after, if we
10 can contain that to protect the officers, the
11 citizens, and the occupants, and we can safely
12 contain that 360 -- we call one, two, three, and
13 four sides -- we can contain all four sides safely
14 without any regards to possibly escape or going
15 into another residence.

16 Simply a surround and call out is just
17 what it kind of says, is we surround it, contain
18 it, and then we start our announcements once it's
19 contained and surrounded.

20 Q So you're going to surround the area
21 that is the subject of the warrant, and then
22 you're going to make an announcement that says
23 something like "Las Vegas Metropolitan Police.
24 Search warrant. Please exit the residence."

25 You know, how does it go?

1 A It's essentially that. "Las Vegas
2 Metropolitan Police Department SWAT team. We have
3 a search warrant for resident A, B, C. Please
4 come out with your hands up." It -- there --
5 there is no clear magical words or dedicated
6 lines, but that's essentially what we want to say.
7 We want to announce that we're the Las Vegas
8 Metropolitan Police Department SWAT team, we have
9 a search warrant, and what the residence is.

10 Q Does Metro believe that surround and
11 call out is in conflict with the knock and
12 announce rule?

13 A No.

14 Q Can you describe for me all the reasons
15 why surround and call out was not used for the
16 January 10, 2022, incident regarding Mr. Williams
17 and who made that decision as to why surround and
18 call out would not be used?

19 A Okay. That's a long question.

20 But just to say, I have never been to
21 that location. But through all my reading and
22 reports and looking up that address and reading
23 the reports of the -- the recommendation for the
24 use of the CET, I would say, first, the ATL that
25 day comes up with the plans to present to his team

1 leader. The ATL will come up with options.

2 In speaking with now-Sergeant Jacob
3 Warner, he did have both options available. The
4 best option that he believed was the CET option
5 for the tactical option.

6 He presented that to both Garth Findley
7 and Russ Backman. I believe Garth Findley was on
8 vacation during the planning process of this, and
9 it was presented to Russ Backman, who then had to
10 get it approved through the tactical commander,
11 Melanie O'Daniel.

12 The reasoning for the CET and not to go
13 to the SACO on that, again, it was a corner
14 building apartment that it was tight to bring in
15 armored vehicles, our BearCats, large vehicles.
16 It had an AMPM -- I don't know the direction, but
17 I'm -- so I'm going to call it the sides that I
18 know. So the building, on the four side, would be
19 an AMPM with a small wall with some wrought iron
20 gates.

21 And then to the three side would be
22 Nellis, kind of an open main thoroughfare. And
23 they had a wraparound, a -- the apartment complex.

24 It was a small apartment. I believe it
25 was a one-bedroom, 750 square feet, if I'm

1 correct, somewhere around that range, with
2 suspects that are believed to be armed and have
3 violent priors.

4 Based on all of those factors and the
5 factors, they believed they could not contain it
6 by a surround and call out, given that -- the
7 closeness of neighboring apartments, the violence
8 associated with the crime being investigated, the
9 area itself in general, like I said, the open
10 areas of the AMPM and Nellis Boulevard, we
11 couldn't contain it fully, they -- they decided on
12 the surround and call out, which was ultimately
13 approved by the tactical commander, Melanie
14 O'Daniel.

15 Q I think you may have misspoken. I think
16 you meant -- you said they agreed on surround and
17 call out. I think you meant they agreed on CET.

18 A I'm sorry. I apologize. I -- they
19 agreed on the CET, controlled entry tactic, which
20 was approved by Melanie O'Daniel. That was
21 briefed to her by Russ Backman.

22 Q And I want to make a distinguishment
23 here.

24 Is it Metro's position that either CET
25 or SACO was feasible, but CET was preferred, or is

1 Metro saying SACO was not even feasible due to
2 certain factors; the only thing we could use here
3 was CET?

4 A Metro as a whole -- so if you're talking
5 about Metro, the department -- leaves it up to the
6 SWAT section, the tactical commander at the time,
7 to make a decision on what tactic to use. Again,
8 going back to everything that an ATL had seen on
9 the recon, had seen on the overlay of the maps,
10 based on his training, experience being up there,
11 being an ATL, believed that the CET was a better
12 tactic to use than the -- the SACO.

13 Q Okay. So it was -- either one in
14 Metro's position was available for use; it is just
15 that SWAT preferred CET; is that --

16 A I -- I believe that night, that
17 incident, it was overwhelmingly better for them to
18 use the CET than the SACO based on what they --
19 they believed they had at hand.

20 Q Okay. But was SACO a viable option?

21 A I wouldn't use viable. I would use an
22 option.

23 Q Okay. So it was at least an option, but
24 it was not used?

25 A Correct.

1 Q And are you aware that Nevada law
2 actually requires de-escalation techniques?

3 A Correct.

4 Q Okay. De-escalation is the concept that
5 law enforcement should be using the least
6 confrontational option; correct?

7 MR. ANDERSON: Objection. Form.

8 THE WITNESS: It's not always the
9 least amount, but in progressions, correct.

10 BY MR. BREEDEN:

11 Q Okay. Do you believe that use of the
12 CET is compliant with de-escalation?

13 A Yes.

14 Q Okay. So that would seem to be
15 contradictory, because CET is a much more
16 confrontational. It involves much more use of
17 force. It involves speed, surprise, and
18 overwhelming force, versus a SACO.

19 So why does Metro consider a CET over
20 SACO to be compliant with de-escalation?

21 A Number one would be safety factors, not
22 only for the occupant inside the residence, the
23 citizens and officers involved. And
24 de-escalation, again, it doesn't mean you always
25 have to use the lowest amount of force needed,

1 because sometimes you're presented with a higher
2 level of force and you have to come -- come back
3 with a -- a level of force that is equal to amount
4 to that.

5 The CET, again, the speed, surprise, and
6 overwhelming action is based on taking that
7 structure, once inside, with speed, surprise, and
8 overwhelming actions to make sure that, again, the
9 officers are safe, the citizens are safe in the
10 residence next door, and the occupants.

11 They verbalize their announcements to
12 give a reasonable amount of time. They use
13 different options prior to hitting the door and
14 verbalizing their announcements all the way
15 through. So, again, I believe it still complies
16 with de-escalation; it's just not the same as a
17 SACO. Two separate and distinguished options to
18 use during search warrants.

19 Q Well, with due respect to you, you talk
20 about the CET being used for safety. Mr. Williams
21 was shot and killed during this.

22 It certainly didn't ensure his safety,
23 did it?

24 MR. ANDERSON: Objection. Form.

25 THE WITNESS: Again, Mr. Williams'

1 death is tragic, and that's not what we plan to do
2 when we do the search warrants. Again, we
3 scrutinize our plans. They're briefed through an
4 ATL, through a team leader to a tactical
5 commander. They're briefed to the team. And none
6 of this -- again, we go through training, we go
7 through the planning phase of the briefing to make
8 it safe. That is beforehand.

9 Once we made entry, again, tragically,
10 Mr. Williams decided to shoot 18 times at the
11 officers making entry, so ...

12 BY MR. BREEDEN:

13 Q Does Metro believe that if it had used a
14 SACO instead of a CET, that this incident more
15 likely than not would not have occurred?

16 MR. ANDERSON: Objection.
17 Speculation.

18 Go ahead and answer.

19 THE WITNESS: Obviously, a SACO being
20 different in -- in tactics, we would not have
21 Officer Kubla inside that quickly. I cannot say
22 if Mr. Williams would have come out and used that
23 firearm or once we made entry -- because,
24 eventually, we have to make entry on a SACO --
25 that it still wouldn't have occurred. But it

1 wouldn't have been that same timing.

2 BY MR. BREEDEN:

3 Q Well, the -- the firefight that occurred
4 that resulted in Mr. Williams' death and -- and
5 you mentioned, you know, the times that he
6 fired -- Mr. Williams was shot 17 times by police.

7 More likely than not, SACO would have
8 avoided that result --

9 MR. ANDERSON: Objection.

10 Speculation.

11 BY MR. BREEDEN:

12 Q -- do you agree?

13 MR. ANDERSON: I'm sorry. Objection.
14 Speculation.

15 THE WITNESS: I agree to the point of
16 that incident. But, again, even in a SACO, we
17 have to make entry at a certain point, so I cannot
18 speculate on whether Mr. Williams would have been
19 inside there and still did that. But, yes, it
20 wouldn't have happened that way.

21 BY MR. BREEDEN:

22 Q I want to talk about noise flash
23 diversionary devices. Sometimes we've been
24 calling them NFDDs for short.

25 Just explain generally what an NFDD is.

1 A Again, a NFDD is a low-level use of
2 force option that we have. We use them
3 predominately on all of our callouts to barricades
4 or hostage situations and search warrants as a
5 means to cause -- they're a couple different
6 purposes.

7 We can use them, again, to alert that we
8 are out there, to get their attention, that there
9 were police. They're used like -- they're a
10 diversionary device to disorientate, confuse
11 somebody inside a residence to give them that
12 split second pause so we have -- again, we have
13 overwhelming action -- we have the upper hand. It
14 takes away a -- a visual and auditory just for a
15 slight second, again, to get the upper hand.

16 So it's more of a tactic to give that --
17 give us the tactical advantage. And when we
18 either have to go in on a hostage situation, a
19 search warrant, that's when we use them, on all
20 operations.

21 Q So NFDDs come in different kinds, but
22 some of them create a very bright flash; correct?

23 A We use -- today we use three different
24 kinds of NFDDs, correct.

25 Q Okay. But -- and some of them create a

1 bright flash; correct?

2 A Correct. I'm sorry. Yeah.

3 Q Have you ever been near one of those
4 when it -- when the flash went off?

5 A Yes.

6 Q How long would you say that that affects
7 your vision?

8 A Half a second. A second.

9 Q Half a second?

10 A If you're -- if you're looking directly
11 at it. I mean, we try not to -- we train not to
12 look at them. But it's a bright, quick flash of
13 light.

14 Q Well, what if you happen to be looking
15 directly at it when it went off, how long do you
16 think that would affect your vision?

17 MR. ANDERSON: Objection.
18 Speculation.

19 Go ahead.

20 THE WITNESS: A second or two.

21 BY MR. BREEDEN:

22 Q And then do you think it would be longer
23 if that went off in a dark environment? In other
24 words, the room is totally dark and it goes off,
25 versus it was the daytime and it went off.

1 Do you think it would affect a person's
2 vision longer if it was deployed in the dark?

3 A I think, naturally, any light that hits
4 your eyes at dark, it takes you a little longer to
5 refocus, so it doesn't matter how bright. I
6 mean -- but I would agree, I mean, essentially,
7 any light that gets flashed in your eyes at night
8 is -- takes you a second more to -- or I
9 wouldn't -- I wouldn't give a time, but it's
10 longer at night because you're not used to --

11 Q Your eyes have to adjust --

12 A Yes.

13 Q -- to the sudden brightness and darkness
14 change; right?

15 A Yes.

16 Q Okay. Some of them also give off a
17 pressure wave; right?

18 A They all do.

19 Q In other words, you can feel them.

20 Like, if you -- even if you were deaf
21 and blind, you would be able to feel them?

22 A There is some slight overpressure, yes,
23 caused by the detonation -- ignition of the
24 flash -- or the powder inside.

25 Q And then they're also designed to make

1 an audible noise; right?

2 A Yes.

3 Q And the noise resembled a gunshot?

4 A I would say that's true.

5 Q Okay. Would you say that laypeople
6 frequently confuse those noises with gunshots?

7 MR. ANDERSON: Objection. Form.

8 THE WITNESS: It could be -- it could
9 be similar to a gunshot noise.

10 BY MR. BREEDEN:

11 Q Okay. And, in fact, in this particular
12 case, I don't know if you saw it on the video, but
13 I believe it's Officer Rothenburg or
14 Officer Bertuccini who was even confused. He
15 heard the nine banger and wasn't sure whether that
16 was gunshots or the nine banger.

17 Were you aware of that?

18 A I'm aware through reading the reports
19 that there was some -- somebody -- like you said,
20 I believe it was Officer Rothenburg that said that
21 to Officer Bertuccini, and that was reference to
22 the nine bang NFDD, which is different than the 25
23 and the audible.

24 Q The -- the nine banger and the stun gun,
25 those are designed to mimic gunshots; right?

1 A The stun stick is not. The -- the nine
2 banger, due to its rhythmic cycle of the nine
3 bangs, was built to mimic fire, or some people
4 believe it's mimicking gunfire.

5 Q And --

6 A Because of the unusual rhythm of -- it's
7 not just bang, bang, bang, bang.

8 Q And that could have been designed in a
9 different way. For example, you could design a
10 device that sounded just like a police siren, and
11 that wouldn't resemble gunfire, and it would still
12 distract people.

13 But the noise flash diversionary devices
14 used for Mr. Williams' case, those resembled
15 gunfire; correct?

16 MR. ANDERSON: Objection. Form.

17 Go ahead and answer.

18 THE WITNESS: Again, they're --
19 they're a high-decibel diversionary device that we
20 use to divert their attention to wherever we're
21 directing our team to enter. We're not using it
22 to mimic gunfire.

23 BY MR. BREEDEN:

24 Q But it does sounds like gunfire; right?

25 A To laypeople, like you said, to some

1 people, it could.

2 Q Okay. And is it Metro's position that
3 deployment of NFDDs is inconsistent with the knock
4 and announce rule?

5 A No.

6 Q Well, if the goal of knock and announce
7 is to allow people a reasonable time to come to
8 the door and ascertain that it's police officers
9 and allow them entry, why would Metro, during the
10 time that's supposed to be happening, deploy a
11 noise flash diversionary device that sounds like
12 the person is under gunfire?

13 A So during the announcements, we won't
14 deploy the NFDDs. But if we're going to use a
15 tactical option of taking a window or opening a
16 door, the teams may choose to use the NFDDs just
17 as they're entailed to be used as -- to divert
18 their attention away from what they're doing.

19 So in this situation of the CET, they
20 used those -- they used a 25 Def Tec on a stun
21 stick to introduce it into a window and a
22 CTS 9-Bang NFDD on the two side to divert their
23 attention away from them using the manual breach
24 on the front door.

25 Q If the knock and announce rule requires

1 giving Mr. Williams time to come to the front door
2 and allow officers entry, why would they be
3 deploying a nine banger across the apartment,
4 outside a window, to distract his attention?

5 A Again, at that time, after those set of
6 announcements were given, the plan was to manually
7 breach the door and then eventually make entry.
8 If, prior to that announcements, the door would
9 have been opened, they would not -- they would
10 have delayed on making that NFDD. But at that
11 time, they chose the -- the plan was after those
12 announcements that were given after the insertion
13 of the stun stick, they would begin to manually
14 breach the front door and, once that door is open,
15 make entry.

16 The NFDDs were used to distract -- if
17 somebody was still inside, to divert their
18 attention from either arming themselves or trying
19 to escape while the team is entering.

20 Q Well, the plan of SWAT that morning was
21 to deploy the -- to break out the rear window and
22 to deploy the stun stick inside the apartment
23 immediately on conclusion of the second
24 announcement; correct?

25 A I believe that was the plan. After the

1 second announcement, Bertuccini would insert the
2 stun stick in the two-side window and initiate the
3 25.

4 Q There was no time preplanned into that
5 between the announcement and insertion of the
6 sun -- stun stick for Mr. Williams to get up and
7 come to the door and allow officers inside, was
8 there?

9 A Still, there was six seconds for him to
10 come to the front door to give him announcements
11 or to give him announcements that we were going to
12 come in and to surrender.

13 Q So there were -- there were two types of
14 NFDDs used here. There was what I would call a
15 nine banger and what I would call a stun stick.

16 Can you give me the exact make and model
17 of those two different kinds?

18 A So -- so the stun stick itself is just
19 the implementation tool that we use to extend the
20 Def Tec 25. And the Def Tec 25 is just -- it's a
21 12-gram NFDD that we use. It's roughly around --
22 when it -- when it goes off, it's about 175
23 decibels, and we try to keep it -- the
24 manufacturer says 5 feet away from an individual.

25 The nine bang is a CTS 9-Bang. I

1 believe it's 43 grams, and it's got nine different
2 audible sounds, like, that are about 180 decibels.

3 Q And these are deployed -- you know,
4 they're, like, little canisters, and they have a
5 pin like a grenade that is removed before they --

6 A Yeah, it's like a smoke canister that
7 you would see. Again, it's got a pin and a -- and
8 a spindle that comes off, and then it ignites
9 within half a second.

10 Q Who was the officer that actually
11 deployed the nine banger that morning?

12 A Officer Chris Latham.

13 Q Who was the officer that deployed the
14 stun stick and the charge in the stun stick?

15 A Officer James Bertuccini.

16 Q And so I know from prior testimony that
17 Officer Bertuccini was to deploy the stun stick
18 and its charge immediately after the second
19 announcement.

20 What was the plan as to when the nine
21 banger was to be deployed?

22 A I don't recall reading or getting
23 briefed on the plan of the nine banger. But just
24 knowing what I do now, based on our tactics, is
25 the nine banger would go off the -- Bertuccini's

1 ignition of his 25.

2 Q So --

3 A But they're in succession.

4 Q Okay. So you believe, then, that
5 Officer -- I think you said it was Latham.

6 A Latham.

7 Q -- that Officer Latham was to deploy the
8 nine banger once the charge of the stun stick was
9 deployed?

10 A Again, I'm just basing it off what I do
11 know now based on tactics and planning, because
12 reviewing their plan, I seen the draw up of their
13 plan prior to their brief, and next to Latham's
14 name, it says nine bang.

15 Q Okay. And -- but you believe, you know,
16 to -- to Metro's knowledge, that the plan was to
17 deploy the nine banger contemporaneously with the
18 stun stick?

19 A Yes, based on just tactics. Again, I
20 wasn't at the briefing and I don't have a
21 dictation of the briefing because they're not
22 recorded and there's no -- I'm just basing it off
23 of what I seen on the drawings of the plan. Based
24 on tactics, it could be -- I believe it was
25 used -- after the 25 was initiated, the nine

1 banger would go off, or it would be a call by the
2 ATL to say, set the nine bang off.

3 But I don't recall, after watching the
4 body-worn cameras, that there was an actual
5 command to Chris Latham to throw the nine bang.
6 So that's why I base it that it was briefed that
7 he would throw it after the 25.

8 Q The nine bang, that was deployed before
9 Mr. Williams fired his weapon; correct?

10 A I believe so. I -- I would have to
11 review that video again, but I do believe so. It
12 was after the 25, because there was no gunshots
13 before the 25 or after the 25, and the nine bang
14 went right after the 25.

15 Q And then do you believe the nine bang
16 was deployed before the officers took their first
17 shots?

18 A Yes.

19 Q And do you believe the nine banger had
20 fully deployed all nine shots before Mr. Williams
21 fired any round from his weapon?

22 A I don't recall based on when I watched
23 the video. I would have to watch it again and
24 just to hear it, if all of them successfully
25 deployed, all nine, prior to entry and prior to

1 the shots being fired.

2 Q You --

3 A I'm sorry, I couldn't -- I couldn't
4 answer that.

5 Q You agree with me that at least some of
6 the deployments of the nine banger occurred before
7 Mr. Williams fired his weapon?

8 A Yes, I would agree with you on that.

9 THE VIDEOGRAPHER: Mr. Beas, would you
10 be so kind as to slide your water six inches.
11 Thank you. Thank you.

12 BY MR. BREEDEN:

13 Q We're going to transition here into the
14 department's policies regarding knock and announce
15 and how it's supposed to be performed by officers,
16 including SWAT.

17 First of all, what are all of Metro's
18 rules, policies, or procedures concerning knock
19 and announce? Where -- where are they contained?

20 A When you first start talking -- when you
21 start talking about search warrants, you have
22 search warrant and prep class, the classes you
23 take to either -- to start authorizing -- or I'm
24 sorry, not authorizing, being the affiant of a
25 search warrant. You go through training that is

1 given by Metro.

2 And in that training, they do talk
3 about, again, Wilson v. Arkansas and some other
4 cases. And I haven't taken it for probably 15, 20
5 years. But I -- I would say that a newer case
6 would involve the Banks case and other associated
7 cases with knock and announce.

8 That's when you first start learning
9 that, if not also in the academy, of case law,
10 U.S. constitutional law, and Nevada state law.
11 Prior to a couple of years ago, when SWAT took
12 over all service of the search warrants, some
13 sections were authorized to serve warrants. When
14 those sections, like, narcotics, vice, gangs, were
15 authorized to serve search warrants, they had to
16 go to a tactical class, a service of search
17 warrant tactical class. I believe it was a
18 ten-hour case. And, again, those cases and
19 those -- talking about announcements, the knock
20 and announce, would be given in that class.

21 Now the department has moved to just
22 SWAT. So, again, when we brief every case, prior
23 to briefing, we talk about how many announcements,
24 how long it's going to take prior to us making
25 entry. And we base that on the knock and announce

1 state law and the U.S. Constitution.

2 Q Has there ever been a written or
3 unwritten policy about how many seconds or minutes
4 officers are supposed to wait between the
5 announcements and the use of force to enter the
6 residence?

7 A In my research, I could not find any
8 written -- and, again, any unwritten. Because you
9 have to take every case by its singular case,
10 based on what is presented, what intel do you have
11 on that particular search warrant.

12 Because every search warrant is going to
13 be different, so you base reasonableness off --
14 the reasonableness of the time based on the
15 factors that are presented to you. And in that
16 case, again, I went through tons of factors that
17 were presented to them that when -- moved them to
18 the CET and moved them to what announcements or
19 how many announcements they would give prior to
20 making forcible entry.

21 Q So there's been some reference in the
22 CIRT report and I believe one of the other
23 witnesses mentioned that at one time there was a
24 ten-second rule.

25 Are you aware of any time or any written

1 or unwritten policy or procedure that officers
2 were to wait at least ten seconds before using
3 force after the announcements?

4 A I mean, there is -- there's different
5 case law that talk about ten seconds or less than
6 ten -- sorry, ten seconds. There's also case law
7 that talks about 15 to 20 seconds. I could not
8 look at anything in our SWAT manual, our SWAT
9 lesson plans that specifically state the exact
10 seconds that you would need. Everything goes back
11 to the reasonableness based on your intel that you
12 have on that search warrant.

13 MR. BREEDEN: Okay. I noticed we've
14 been going for about an hour and a half. Why
15 don't we take a five-minute break.

16 MR. ANDERSON: Yeah.

17 THE VIDEOGRAPHER: The time is
18 10:36 a.m. We are off the record.

19 (Whereupon, a recess was taken.)

20 THE VIDEOGRAPHER: The time is
21 10:46 a.m. We are on the record.

22 BY MR. BREEDEN:

23 Q Okay. So I want to make sure that I
24 understand your testimony on behalf of Metro
25 regarding the last topic.

1 Your testimony is that Metro has never
2 had any formal or informal policies as to how many
3 seconds or minutes officers are supposed to wait
4 between announcements and using force to enter a
5 residence under the knock and announce rule.

6 Is that your testimony?

7 A That there's a specific amount of time
8 prior to making forcible entry?

9 Q Yes.

10 A No, there's nothing written. Again, it
11 goes back to even when you look at all of the case
12 laws, they're different. And it just -- we base
13 it on you have to make the announcements of the
14 authority and purpose and then give them a
15 reasonable time to come and submit or --

16 Based on the factors of the search
17 warrant that you have, everything in totality is
18 based -- bases your reasonableness of time. So
19 every search warrant could be -- it will be
20 different about that reasonableness of time.

21 Q Well, in Metro's opinion, is one second
22 ever reasonable?

23 MR. ANDERSON: Objection. Form.

24 THE WITNESS: Again, I -- I don't
25 believe it would be one second, because then

1 you're -- you're touching into the -- almost the
2 no-knocks. It could be one second if -- based on
3 circumstances that you see once you are
4 presented -- you get up there. If you see an
5 obvious sign of escape or somebody -- that door is
6 open and somebody visually sees you and your
7 authority, and they're backing up into the
8 residence. So it could be one second.

9 But we wouldn't say, "Hey, we're only
10 going to give one-second announcements and bang
11 the door." I mean, everything is on the totality
12 of the circumstances that are presented prior to
13 the event, based on the details, and then, going
14 up to the door, what you see.

15 BY MR. BREEDEN:

16 Q Well, I want to use the -- the following
17 factual scenario, then, is that there are
18 announcements and then there is literally nothing
19 that is seen or heard inside the residence.

20 Would you agree, on behalf of Metro,
21 that waiting just one second between the
22 announcement and the use of force when there's
23 nothing seen or heard from inside the residence
24 would be unreasonable?

25 A It would be unreasonable if -- if you

1 make that determination prior, saying we're giving
2 one second and then we're banging the door with --
3 without having anything presented, any factors.
4 And, again, it goes back to also what you are
5 going to -- projected to foresee inside there, if
6 you're going to expect to encounter armed
7 individuals or immediate destruction of evidence
8 or an escape.

9 So, I mean, I don't know where you're --
10 I mean, I don't know what you're asking about the
11 one second. We'd never factor in the one second
12 in training. It's all based on reasonableness --
13 based on state and U.S. laws, the reasonableness
14 of giving our announcements, and then based on is
15 it a CET tactic or is it a SACO tactic, what is
16 going to be the safest for, again, the officers,
17 the citizens around there, and the occupants.

18 Q Well -- well, let me start this. Let --
19 let me do it this way.

20 Most people would probably concede that
21 if officers knocked and announced and then waited
22 an hour and there were no activities or anything
23 inside the residence, that, at that point, it
24 would be reasonable for them to use force to
25 enter. Okay?

1 So we -- somewhere between zero seconds
2 and one hour, there's an amount of time that Metro
3 should likely not consider to be reasonable under
4 any circumstances.

5 So what amount of time is that? Is it
6 one second? Two seconds? Three seconds?

7 MR. ANDERSON: Objection. Form.

8 Go ahead.

9 THE WITNESS: Again, it's based on the
10 totality of the incident. I mean, I can't -- you
11 can't put a time on every single search warrant.
12 You can't say, "This is going be to a one-second
13 search warrant or a five-second." Obviously,
14 going into the planning, one second would be
15 unreasonableness -- or unreasonable. But if
16 factors present themselves and you only have one
17 second, it could become reasonable.

18 BY MR. BREEDEN:

19 Q Okay.

20 A But there is no -- I'm sorry to cut you
21 off. But there is no formalized in writing how
22 many seconds you have to wait. We base it on case
23 law, state and U.S. law, and those cases that we
24 mentioned prior, that every one of them are
25 different in the timings of -- of announcements.

1 So the ATL and TL take those factors in
2 based on what they're given and then what they're
3 given at the time of the service of the search
4 warrant.

5 Q Okay. Well, even before they got to the
6 site for Mr. Williams' case, they preplanned to
7 use force to break out the back window and deploy
8 the stun stick immediately after the second
9 announcement; correct?

10 A Correct.

11 Q So they planned for zero amount of time
12 or maybe as long as one second after the second
13 announcement before they would use force; correct?

14 MR. ANDERSON: Objection. Form.

15 THE WITNESS: The -- the plan for that
16 specific -- specific raid, for that CET was two
17 announcements, and then they would introduce the
18 stun stick to deploy the 25 distract, the NFDD,
19 prior to manually breaching the front door to make
20 entry.

21 BY MR. BREEDEN:

22 Q And do you agree that -- that that
23 morning, on January 10th of 2022, that the first
24 use of force to enter the premises was the
25 breaking of the window to insert the stun stick?

1 A Yes, that's a low-level use of force and
2 intrusion into the apartment, was the introduction
3 of the stun stick and the 25.

4 Q And that occurred almost simultaneously,
5 as well, with the first use of the battering
6 device on the front door; correct?

7 MR. ANDERSON: Objection. Form.

8 THE WITNESS: I believe it was three
9 seconds after the -- that initiation of the 25 was
10 the first battering of the manual breach.

11 BY MR. BREEDEN:

12 Q Okay. Well, we'll look at the video --

13 A Yeah.

14 Q -- to see what it is. My recollection
15 is it was essentially at the same time, but the
16 video will show.

17 A Okay.

18 Q You keep saying in some of your
19 responses that, no, there's no -- there's no
20 policy in writing.

21 Is there any unwritten policy or
22 practice?

23 A Again, the unwritten would be the
24 planning phases of each particular search warrant
25 and what you have, the -- the structure, the size,

1 the occupants, the citizens' safety. We take that
2 all in account and base it off of how long we want
3 to wait before we use a NFDD or before we want to
4 manually breach to make entry.

5 Q Okay. Well, let me -- because you
6 mentioned factors, and you say to -- totality of
7 the circumstances, and that's fair, because that's
8 legal phrasing from case law.

9 A Uh-huh.

10 Q Okay? But let's apply it specifically
11 to Mr. Williams' case, where officers are on both
12 sides of a small apartment at 5:00 in the morning
13 when it is likely people inside are asleep, and as
14 they make the announcements, they hear and see
15 nothing from inside the apartment.

16 What is Metro's position on how long is
17 reasonable for officers to wait until they begin
18 forcefully entering that apartment?

19 A Again, I don't believe the -- the
20 department has a position on giving the tactical
21 team a specific amount of time to wait. It -- it
22 depends on the tactic used. So that night, they
23 used the CET tactic.

24 At -- after the second announcement,
25 which I believe was six seconds, they introduced

1 the stun stick and then started manually breaching
2 the front door, still giving announcements as
3 they're doing that. And then when they finally
4 made entry into the threshold of the apartment,
5 still giving announcements.

6 They based their reasonableness amount
7 of time based on officer safety. They didn't want
8 to wait a long time out there because they knew
9 there was possibly -- could be armed suspects in
10 there, and the nature of the crime that they
11 were -- that the warrant was for.

12 Q Well, I don't want to argue with you,
13 but officers could sit behind a BearCat for hours
14 while they did a surround and call out; right?
15 There's no risk to the officers in doing that, is
16 there?

17 MR. ANDERSON: Objection. Form.

18 THE WITNESS: Even in a SACO, we
19 wouldn't wait an hour. But I agree with you,
20 there's -- the officers are afforded more cover
21 and concealment and safety behind an armored
22 BearCat. But that -- based on the plan, the
23 armored BearCat could not be used on the one side
24 by the front door on that incident.

25

1 BY MR. BREEDEN:

2 Q But several of the officers actually on
3 the ground when this happened had ballistic
4 shields as well; right?

5 A Yes. I believe a ballistic shield was
6 used by Officer Rothenburg on the two-side window
7 where the stun stick was used, and I'm sure they
8 had one up -- I believe they did have one up front
9 in front of the door.

10 Again, those ballistic shields are a
11 safety factor that we use. They provide minimal
12 coverage. They don't -- those are pistol-rated
13 shields. They're not as safe as a BearCat, and
14 they don't provide the whole team with coverage.

15 Q Metro agrees that its own CIRT review,
16 which was agreed by the Tactical Review Board,
17 found that officers had only waited six seconds
18 between the announcement and use of force to enter
19 the apartment.

20 Do you -- do you agree?

21 A That was the timing of the -- the stun
22 stick, yes.

23 Q Okay. And plaintiff actually disputes
24 that number of seconds, the six seconds figure.
25 We think it's less. Ultimately, a jury may have

1 to look at it and determine.

2 But even the six seconds, CIRT and TRB
3 both determined that that was not a long enough
4 amount of time to comply with the knock and
5 announce rule.

6 Does Metro acknowledge that?

7 MR. ANDERSON: Objection. Form.

8 Go ahead.

9 THE WITNESS: CIRT had their
10 recommendations. I believe they said, based on
11 Anthony's recommendation, that it wasn't long
12 enough, but SMEs in there still conflicted with if
13 that was reasonableness or not, the timing for the
14 announcements.

15 BY MR. BREEDEN:

16 Q But TRB also reviewed that conclusion
17 and upheld it; correct?

18 A I believe so, yes.

19 Q And TRB is formed solely of people who
20 are Metro employees, as opposed to outside
21 consultants; correct?

22 A The TRB, I believe they don't have any
23 outside. I think it's just the use-of-force
24 board.

25 Q And TRB unanimously sustained that

1 finding, didn't they?

2 A I would have to relook at the TRB, but
3 I -- if you're saying that's on the record, then I
4 agree with you.

5 Q Is Metro in this litigation now going to
6 dispute the findings of CIRT and TRB that SWAT did
7 not allow a reasonable amount of time to comply
8 with the knock and announce rule?

9 MR. ANDERSON: Objection. Form.

10 THE WITNESS: The findings by the CIRT
11 review board and the Tactical Review Board were
12 based on department policy and if they found it
13 reasonableness of six seconds, given those
14 factors. They ultimately decided that the SWAT
15 six-second announcements was not reasonable based
16 on that incident, but it did not -- again, there's
17 factors when you're talking about department
18 policy, state policy, and U.S. law.

19 At the time of the incident, the SWAT
20 operators, the ATLs, the team leader, and then
21 ultimately the tactical commander, who was not out
22 there, agreed that the two announcements would --
23 equated to the six seconds was adequate enough.

24 BY MR. BREEDEN:

25 Q Okay. I want to make sure that I

1 understand your testimony.

2 Are you saying Metro is now taking a
3 position in this litigation, now it -- that it's
4 been sued, that CIRT and TRB got it wrong?

5 MR. ANDERSON: Objection. Form.

6 THE WITNESS: I don't want to say they
7 got it wrong, but CIRT can come up with
8 recommendations that still can get overturned
9 because it's based on what they believe department
10 policy should be.

11 BY MR. BREEDEN:

12 Q Well, that's right. And the board that
13 can overturn them is the Tactical Review Board,
14 and they chose not to on that reasonableness
15 finding; correct?

16 A Again, I would have -- I -- I read the
17 CIRT review board findings. I don't recall the
18 Tactical Review Board, but it -- but, again, if
19 you're saying that that's on the record, that's
20 their belief at the time, it was unreasonable.

21 Q So you're saying that was their belief
22 at the time, that it was unreasonable, that the
23 knock and announce rule had not been complied
24 with.

25 So my question is: Is Metro now

1 disputing that conclusion, or do they stand by
2 that earlier conclusion?

3 A They're not disputing the findings of
4 the CIRT review or the Tactical Review Board.
5 Again, I think when you're talking about
6 reasonableness of -- of time, there's many factors
7 that go into it. And at the time, that SWAT team
8 that conducted that raid on that mission believed
9 that they were within state and U.S. law to use
10 the six seconds prior to introducing the stun
11 stick.

12 Q Okay. And does Metro now acknowledge
13 that that was incorrect and that was an
14 unreasonable amount of time?

15 A The findings were that, based on that
16 incident, it was an unreasonable amount of time.
17 That's what the CIRT and Tactical Review Board had
18 stated.

19 Q And -- and that is Metro's position?

20 A Ultimately, it's Metro's position based
21 on those reports.

22 Q Okay. Prior to this incident in January
23 of 2022, Metro's official policies allowed a CET
24 to be used for knock and announce warrants;
25 correct?

1 A Correct.

2 Q Okay. And that policy was later
3 revised; true?

4 A It's been revised a couple of times
5 language wise, but it -- it -- yes, it has been
6 revised --

7 Q Okay.

8 A -- several times.

9 Q And we'll -- we'll talk about that --

10 A Okay.

11 Q -- and the revisions and when and why
12 they occurred. But I just want to establish for
13 now that, prior to this incident, CET was being
14 used by Metro's SWAT for knock and announce
15 warrants.

16 That's true; correct?

17 A It's been used for 20-plus years and
18 thousands -- thousands of warrants, yes.

19 Q Okay. And at least prior to this
20 incident, it was Metro's policy that NFDDs also
21 complied with knock and announce principles?

22 A Yes.

23 Q Okay. Was it Metro's policy at that
24 time that blind insertion of NFDDs complied with
25 the Fourth Amendment?

1 A The blind insertion of it is a
2 procedural policy that -- that when we introduce
3 a -- well, two different factors. So when we're
4 introducing one into the structure, they want you
5 to visually clear the area to make sure it's not
6 going to go off right in front of somebody's face.

7 In the outside, they want to make sure
8 your -- your area is clear for fire hazards or
9 obstructions like small rocks that could propel.
10 So two different instances, if either it's going to
11 be an outside deployment or inside deployment.
12 But, yes, there is procedural policies in our
13 manual that dictate clearing of the area.

14 Q Are those also constitutional
15 requirements under the Fourth Amendment?

16 MR. ANDERSON: Objection. Form.

17 THE WITNESS: Of the clearing of the
18 area?

19 BY MR. BREEDEN:

20 Q Yes.

21 A I don't believe so.

22 Q Okay. So you're the current SWAT
23 tactical commander, and you're in charge of
24 training SWAT on these issues.

25 A Was that your question? I'm sorry.

1 Q Yeah. I'm sorry.

2 A Oh.

3 Q I'm looking at my notes here.

4 A Okay.

5 Q So just to -- to restate the question I
6 was about to ask, you believe -- does Metro
7 believe that the Constitution would allow it to
8 simply blindly deploy or throw into a residence an
9 NFDD?

10 A No, because if we blindly throw it
11 without any control of it, we would have --
12 without visually clearing the inside structure,
13 there could -- it could cause injury to any
14 occupants in there. That's why the stun stick was
15 used, so we can have control of where that
16 deployment of that 25 was deployed once it was
17 inserted.

18 Q Now, I've seen the video, you've seen
19 the video of the deployment of the stun stick.

20 Do you agree with me that when that was
21 deployed, when the charge on the stun stick was
22 deployed, officers had no idea who was inside the
23 apartment or where they were in the apartment?

24 A When Officer Bertuccini inserted the
25 stun stick, he was aware nobody was directly

1 behind the window, but I would agree with you that
2 he did not know where Mr. Williams or any other
3 occupant was at inside the structure.

4 Q Well, there was actually a closed blind
5 there; right? People could not see inside.

6 A It was closed prior to the insertion,
7 but when you insert it, there -- there -- you
8 would be able to see that nobody was directly
9 behind it. But I agree with you that he couldn't
10 see inside that structure to where -- if anybody
11 else was in there.

12 Q And you agree that deployment of these
13 NFDDs close to somebody's person, that those can
14 potentially harm the person?

15 A If it's directly next to them based on
16 the -- the fire -- or the -- I don't want to say
17 explosion, but the powder being ignited could burn
18 a person if they're directly next to it, and it's
19 also a more overpressure that could -- it's a
20 higher PSI, more overpressure.

21 Q It's against department policy to deploy
22 NFDDs too close to a person; right?

23 A Yes.

24 Q And what is the amount of inches or feet
25 that the department considers to be too close?

1 A In the Def Tec 25, the manufacturer is
2 5 feet. And that's what we use when we insert and
3 also deploy on the outside. So we want it to be
4 about 5 feet -- around 5 feet.

5 Q Are you familiar with the Ninth Circuit
6 case Boyd v. Benton County?

7 A I don't know it if you -- just off those
8 names, but --

9 Q Okay. So in Boyd v. Benton County, the
10 Ninth Circuit wrote, quote, "Given the inherently
11 dangerous nature of the flash-bang device, it
12 cannot be reasonable use of force under the Fourth
13 Amendment to throw it blind into a room occupied
14 by innocent bystanders," end quote.

15 So there is a constitutional requirement
16 that covers NFDDs and how they're deployed.

17 Would you agree with me that
18 Mr. Williams was an innocent bystander in this
19 operation?

20 MR. ANDERSON: Objection. Form.

21 THE WITNESS: He was an occupant
22 inside the structure that was not named in the
23 search warrant, I agree with you. But, again, the
24 deployment of the 25 was not thrown into the
25 structure where they didn't have control over it,

1 so that's -- there's two different -- differences
2 on the deployment of actually throwing it into an
3 unknown occupied structure or the stun stick,
4 where you have control of it and positioning of
5 it.

6 BY MR. BREEDEN:

7 Q And I want to talk about Metro's
8 distinction here. So Metro's official position
9 is, "We couldn't blindly physically throw an NFDD
10 into a room where we didn't know where people
11 were, but if we had it on a stun stick and we
12 deployed it, we can just deploy it blindly through
13 a window."

14 Is that what Metro's position is?

15 MR. ANDERSON: Objection to form.

16 THE WITNESS: Again, it's not blindly
17 throwing it in there. When he -- when
18 Officer Bertuccini inserted the stun stick into
19 that two-side window, he could tell that there was
20 nobody directly behind that window, and he
21 believed he had the -- a 5-foot distance to
22 anybody that he could see, and it's deployed at
23 the top of the ceiling to give it the most
24 distance away from any occupant that could be in
25 there.

1 BY MR. BREEDEN:

2 Q Well, and, in fact, Mr. Williams was
3 sleeping right on the other side of the window;
4 right?

5 MR. ANDERSON: Objection. Form.

6 THE WITNESS: He was to the left of
7 the window on the couch, based on what --
8 reviewing the reports.

9 BY MR. BREEDEN:

10 Q How many feet do you believe he was from
11 that charge when it was deployed?

12 A I believe he was within the safe
13 distance, beyond the 5 feet. Because, again,
14 you're deploying it to the top of the ceiling, and
15 he was closer to the ground.

16 Q So how high were the ceilings?

17 A I don't know.

18 Q Was the stun stick actually touching the
19 top of the ceiling?

20 A In the deployment and planning of the
21 deployment, you want to get it closest to the --
22 the top of the ceiling. I would have to review
23 photos of the actual inside, and we could see burn
24 marks or something like that that would dictate
25 how close it was to the top of the ceiling.

1 Q And then where Mr. Williams' head was --
2 if he had actually been sleeping in a horizontal
3 position, his head would have been at least a
4 couple of feet off the ground.

5 Do you agree?

6 A If he was sleeping sitting down?

7 Q Laying down.

8 A Laying down. Again, I don't know the
9 distance of the ceiling to Mr. Williams, but,
10 again, it would still be within the recommended
11 distance of the 25, given that -- the 175 decibel
12 and the PSI level.

13 Q Would Metro concede that if a jury heard
14 this case and felt that the NFDD was deployed
15 within 5 feet of Mr. Williams, that that would
16 violate his constitutional rights?

17 MR. ANDERSON: Objection. Form.

18 THE WITNESS: I don't believe it would
19 violate his constitutional rights. It's just how
20 much more overpressure or decibel levels that he
21 would succumb to. Now, if he was directly behind
22 the window and we knew that and we still deployed
23 the 25, that could constitute.

24 BY MR. BREEDEN:

25 Q Would Metro concede if a jury felt that

1 the 25 was deployed in less than 5 feet from
2 Mr. Williams, that that would violate department
3 policy?

4 MR. ANDERSON: Objection. Form.
5 Go ahead.

6 THE WITNESS: Again, the recommended
7 distance given by the manufacturer is 5 feet based
8 on decibel and PSI level. The -- again, going
9 back to clearing directly behind it and the belief
10 that Officer Bertuccini believed he had enough
11 distance from anybody he could see, he believed
12 that he had enough distance to deploy the NFDD.

13 BY MR. BREEDEN:

14 Q Okay. Well, whether he believed that or
15 not, if, in fact, he deployed that in less than
16 5 feet from Mr. Williams, that would be against
17 the manufacturer's recommendation; correct?

18 A Yes.

19 Q And has Metro adopted the manufacturer's
20 recommendation as its policy as well?

21 MR. ANDERSON: Objection. Form.

22 THE WITNESS: We follow the
23 recommendations of the manufacturer to do it -- to
24 deploy it inside a structure, yes --

25 MR. BREEDEN: Okay. Now, I'm going to

1 hand you something that we'll have marked -- I
2 think this will be Exhibit 2 to today's
3 deposition.

4 (Exhibit 2 was identified.)

5 BY MR. BREEDEN:

6 Q Exhibit 2 is an excerpt from Las Vegas
7 Metropolitan Police's SWAT manual, and it's been
8 produced in this litigation as LVMPD1490 and 1491.

9 Have you ever seen this portion of the
10 manual before?

11 A What -- what year was this? Because I
12 reviewed the one that was dated prior to this
13 incident, so is this the one that was --

14 MR. ANDERSON: This is 2021, yeah.

15 THE WITNESS: 2021. Okay.

16 BY MR. BREEDEN:

17 Q Yeah, I think this is the one that was
18 in effect when this incident occurred.

19 A Okay. Yes, I did review it.

20 Q Okay. I will let you know that, you
21 know, there's -- there's probably 20,000 pages of
22 documents that have been produced in this
23 litigation, and this is the only document that I
24 can find that discusses knock and announce and
25 Wilson v. Arkansas and anything that might be

1 considered training on those subjects.

2 Are you aware of something other than
3 this document that has been used to train SWAT
4 officers on knock and announce principles?

5 A Yes, I -- again, it goes -- we have a
6 PowerPoint lesson plan on tactical planning and
7 service of search warrants that, again, covers all
8 of these factors. I would have to review the date
9 again to see if it was -- I believe it was '21. I
10 just don't know if it was prior to this incident.

11 Q Okay. And the -- the topic actually
12 requests that if you are aware of other documents,
13 that you be able to reference the specific Bates
14 number, which is an identifier used for this
15 litigation.

16 I'm sure that you don't have a
17 photographic memory, but are you aware of a
18 specific Bates number for that training you
19 referred to?

20 A No.

21 Q Okay. So will you agree with me that
22 Exhibit 2 by itself is insufficient training as to
23 the knock and announce rule?

24 MR. ANDERSON: Objection. Form.

25 THE WITNESS: Just this document in

1 and of itself --

2 BY MR. BREEDEN:

3 Q Yes.

4 A -- would be not enough --

5 Q Okay.

6 A -- documentation. But this isn't the
7 only training or times that they're taught about
8 in -- in the totality of learning about search
9 warrants, planning them, and serving them.

10 Q Do you agree that this is the only area
11 of the SWAT manual -- the specific SWAT manual
12 that mentions knock and announce?

13 A In the SWAT manual?

14 Q Yes.

15 A Yes. And this is under the -- I believe
16 this section is a cutout from the -- the service
17 of search warrants tactical planning.

18 Q Okay. And this portion of the SWAT
19 manual, it doesn't mention other applicable,
20 more-detailed cases like the Banks or the
21 Granville case, and it doesn't give any guidance
22 as to the amount of seconds or minutes that's
23 reasonable under those cases.

24 Do you agree with that?

25 A I do agree with that, that they only

1 cite the Wilson v. Arkansas.

2 Q Yeah.

3 Does Metro even provide the Wilson v.
4 Arkansas case to SWAT members so they can actually
5 read the case?

6 A The -- the whole case in entirety, I
7 couldn't answer that question, but it -- the
8 summary, I believe they should talk about it in
9 the tactical planning service of search warrant
10 class.

11 Q Okay. But sitting here today, you have
12 no information that the actual case is provided to
13 officers to read?

14 A No.

15 Q Okay. So, again, we're talking about
16 the policies and procedures which were in effect
17 prior to January 10, 2022.

18 And so, at that time, what was the
19 department's formal or informal policy or practice
20 as to the issue -- the following issue: When
21 knock and announce is performed when serving a
22 warrant, is there to be an actual physical knock
23 on the door?

24 A No.

25 Q So it was Metro's official policy not to

1 even attempt a physical knock?

2 A The policy dictates you have to give
3 announcements, but it doesn't specifically cite
4 that it has to be an actual knock and announce,
5 but as long as you give an announcement of your
6 purpose and authority.

7 Q Okay. Was Metro's policy to ever
8 attempt a physical knock?

9 A Again, citing the -- what is written,
10 there's no policy that says you have to physically
11 knock, because we base it off U.S. and state law
12 where there is no mention of an actual physical
13 knock as long as you still verbalize your
14 authority and purpose.

15 Q Well, the rule is literally called knock
16 and announce, not knock or announce; right? But
17 you're telling me that Metro's policy was not to
18 even attempt the knock portion?

19 A So going to the knock and announce,
20 actually coming from common law going to U.S. law
21 and -- and state law, it doesn't specifically
22 announce in any case law that there is an actual
23 physical knock needed for the announcements. We
24 based our policy on those factors.

25 If there's an opportunity to make a

1 knock, the -- the tactical team, when they briefed
2 it, if they thought it was safe to do so, if there
3 was timing, they would do so. It's -- it's not
4 that they would never do it. But based on case
5 law, they said -- or they believed just the
6 announcements and the -- announcing their purpose
7 would satisfy the knock and announce.

8 Q So it was Metro's official policy that
9 the knock did not necessarily have to be
10 performed?

11 A Correct.

12 Q And so whose discretion was that left to
13 as to whether the knock would actually be
14 performed?

15 A It would be up to the assistant team
16 leader who is making the plan, the team leader who
17 reviews it, and the tactical commander that
18 approves it.

19 Q Now, in Mr. Williams' particular case,
20 you know, I -- I've seen the video, and there's
21 probably at least three officers within 2 or
22 3 feet of the front door when this happens.

23 For this particular operation, why did
24 no one attempt a knock?

25 A I couldn't tell you why these -- they

1 planned to not knock on it. The -- the planning
2 was to give the two announcements prior to the
3 insertion of the stun sticks, and -- and that
4 satisfied the knock and announce part of it.

5 I could not tell you why Jake Warner or
6 Russ Backman or Garth Findley decided not to
7 knock.

8 Q But Metro acknowledges it was preplanned
9 that there would be no knock?

10 A Yes.

11 Q There wasn't any factor that, like, they
12 were planning to knock, and then they got there
13 and they thought, "Oh, it might be dangerous for
14 this reason or that reason to knock, so we're not
15 going to do it"?

16 A I don't know if they had that in mind.
17 But based on reviewing the documents of the
18 planning phase of this, it was -- the two
19 announcements would satisfy the knock and
20 announce.

21 Q Does Metro have any policy, training, or
22 guidance to its SWAT officers as to when they
23 should knock?

24 A There's no guidance to the actual
25 physical knock. It's just, again, based on the

1 principles of the knock and announce that we
2 believe that it doesn't have to be a physical
3 knock as long as you give announcements to your
4 authority and purpose.

5 Q Okay. At that time, what was the
6 department's formal or informal policy or practice
7 as to the following: When knock and announce is
8 to be performed on an apartment, should the
9 announcement include the actual apartment number?

10 A The physical address should always be
11 announced, no matter if it's a residence, a
12 single -- a family residence or an apartment. You
13 would have to state the actual property of the
14 search warrant.

15 Q And so for an apartment, that would
16 include the apartment number?

17 A Correct.

18 Q Okay. Do you recall hearing the first
19 and second announcements from Sergeant Backman?

20 A Yes, I do.

21 Q Okay. And do you recall whether the
22 first announcement mentioned the apartment number?

23 A I believe the first announcement, he
24 said the apartment number at the end of his first
25 phrase and again at the end of the second phrase,

1 but I do know it was said after -- it wasn't in
2 conjunction with the actual property address off
3 of Nellis, but it was said in that phrase of
4 the -- the announcement.

5 Q Okay. Would Metro agree that if the
6 first announcement did not include the apartment
7 number, that that announcement was improperly
8 performed?

9 MR. ANDERSON: Objection. Form.

10 THE WITNESS: It would not be
11 improperly performed, because I still believe the
12 apartment number was given. It was not given
13 directly with the actual Nellis address, but as
14 long as he got the apartment address out during
15 his announcements, it was -- it would satisfy the
16 announcement.

17 BY MR. BREEDEN:

18 Q Okay. Do you recall the apartment
19 number only being mentioned in the second
20 announcement but not the first?

21 A I believe -- was -- was the apartment
22 1120?

23 Q 1125.

24 A 1125 was stated prior to the second
25 announcement.

1 Q So along with the second announcement?

2 A So when he gave his first one -- I would
3 have to read the exact verbiage, but I believe he
4 gave the address, and then they had a police
5 search warrant, and then he said 1125. And then
6 he reinstituted that same announcement.

7 Q Okay. Does Metro believe that the first
8 announcement was properly given?

9 A Yes.

10 Q It believes that the first announcement
11 complied with its own internal policies?

12 A Yes.

13 Q Well, hypothetically, if the first
14 announcement didn't include the apartment number,
15 would Metro concede that that announcement was
16 against department policy?

17 MR. ANDERSON: Objection. Incomplete
18 hypothetical.

19 Go ahead.

20 THE WITNESS: Again, as long as Russ
21 Backman got out the apartment number, our -- the
22 purpose to announce is to give them, again, our
23 authority and purpose for being out there. So
24 Russ Backman did, in this case, give out the --
25 the apartment number, but ...

1 BY MR. BREEDEN:

2 Q The question is: Did he give it out in
3 the first or the second announcement? And I
4 believe it was the second.

5 Is that your testimony?

6 A No, I believe it's still within the
7 first announcement. He just gave the apartment
8 number at the end. He -- it did -- it was not the
9 number of Nellis, Nellis, apartment this, and then
10 search warrant. It -- he broke it up.

11 Q You would agree that, hypothetically, if
12 you just went to the apartment complex and you
13 said, "3050 South Nellis, search warrant," that's
14 not enough information for people in the apartment
15 complex to understand whether their apartment is
16 the subject of the warrant?

17 A For that specific apartment, no.

18 Q Okay. At that time, what was the
19 department's formal or informal policy or practice
20 as to preplanning the use of NFDDs for search
21 warrants?

22 A Again, the policy to use the NFDDs would
23 be based on the search warrant itself. And in
24 this case, it was the CET. The -- the use of the
25 NFDDs were a tactical advantage option. They used

1 two different NFDDs, one to insert it into the
2 window and another on the two side, the nine bang,
3 to distract the occupants away from the front
4 door, which they were about to breach.

5 Q Were -- were NFDDs authorized for the
6 use in any search warrant?

7 A It would -- based -- again, it would be
8 factors that determine, and then there would be
9 factors when we couldn't use them.

10 Q Okay. Who were the people that made the
11 decision on this particular search warrant to use
12 NFDDs?

13 A So, again, all plans are -- start with
14 the assistant team leader on -- based on what his
15 options are throughout the service of the search
16 warrant. He briefs it to the team lead, who
17 then -- the tactical commander has to give
18 approval for the insertion of an NFDD but not for
19 the outside implementation of an NFDD. So in this
20 case, they inserted one, so she had to improve the
21 insertion of the NFDD.

22 Q So, specifically, you're referring to
23 Lieutenant O'Daniel?

24 A Yes.

25 Q And also Sergeant Backman reviewed and

1 approved that; correct?

2 A Sergeant Backman, and I believe
3 ultimately Sergeant Findley as well the day of.

4 Q Is it Metro's position that the NFDDs
5 were properly deployed on January 10, 2022?

6 A The -- the insertion -- I believe the
7 CIRT's review said that they could not properly
8 clear the entirety of that structure prior to the
9 insertion, and also there was not enough evidence
10 or presurveillance to say if there was going to be
11 young children or elderly adults that we would
12 want to stay away from. That was their position.

13 Q So that was CIRT's position, that the
14 NFDD had been improperly used, and TRB agreed or
15 sustained that conclusion; correct?

16 A Based on the -- the unknown factors that
17 they cited.

18 Q And is that Metro's position in this
19 litigation, or is Metro going to disagree with its
20 own CIRT and TRB report?

21 MR. ANDERSON: Objection. Can you
22 clarify as to whether you're talking policy or
23 constitution?

24 MR. BREEDEN: Yeah. I can ask it --

25 MR. ANDERSON: Does that make sense?

1 MR. BREEDEN: I can ask it as both.

2 BY MR. BREEDEN:

3 Q So is it Metro's position that insertion
4 of the NFDDs violated its own policies?

5 A So CIRT stated that there was not enough
6 information on the occupants after reviewing the
7 facts after the case. The planning of the
8 insertion of the NFDDs was based on what they knew
9 at that time. Jake Warner, being the ATL, and
10 Sergeant Russ Backman believed they did not have
11 enough intel to tell them that there was going to
12 be those factors of young children or elderly in
13 that structure, so they believed they were well
14 within policy to insert and deploy the 25.

15 CIRT disagreed with that based on there
16 wasn't enough surveillance -- presurveillance to
17 ascertain if there was going to be young kids or
18 elderlies inside that residence.

19 Q And so does -- does Metro agree, then,
20 that that deployment of NFDDs was against its own
21 policies?

22 A Based on CIRT's recommendation that
23 there was not enough presurveillance, yes.

24 Q Okay. And does Metro believe that, from
25 a constitutional standpoint, that insertion of the

1 NFDDs was improper?

2 A Not on a constitutional level. It was
3 based on the -- the policy of the insertion for --
4 to keep it away from young children and adult --
5 elderly.

6 Q Okay. Well -- and, I mean, when you say
7 "young children," would a 19-year-old man fall
8 into the category of people who need to be safe?

9 A We're -- when we're -- the policy is
10 more for young children that are developing their
11 eardrums, because it's the decibel level, so we're
12 talking about toddler age, small children that are
13 still developing in the -- in the eardrums.

14 Q But the policy on NFDDs is really for
15 everyone's safety inside; right? I think it --
16 the case law refers to innocent bystanders.

17 A So -- so when the -- when you're talking
18 about the innocent occupants inside, it's for the
19 free throwing of a distract. So we have more of a
20 leverage when we use a stun stick and we can
21 control that deployment.

22 And, again, going back to what the team
23 leaders and ATL believed at that time, was there
24 wasn't any factors that would limit them from
25 introducing the 25, and it was ultimately approved

1 by Lieutenant O'Daniel.

2 Q Are you saying, then, it's Metro's
3 position that if they physically tossed this NFDD
4 at the ceiling, they couldn't constitutionally do
5 that, but if they just have it on the end of a
6 stick and do the same thing, that is permissible?

7 A No. Again, those are both policies that
8 we try to mitigate injury, so we -- we don't want
9 to deploy into something that we haven't fully
10 cleared. So if we went into that room and we
11 could fully see that it was clear and we wanted to
12 deploy the distract, we could freely do that.

13 Now, to insert it into something with
14 closed blinds, if you could clear behind the
15 blinds and -- and you believed at the time, or
16 Officer Bertuccini, that there was nothing within
17 that distance of deploying it on the stun stick,
18 he was within the SWAT policy at the time.

19 Q And the next topic, I think we've
20 already spoken about this some.

21 But you're saying, at that time, there
22 was no formal or informal policy or practice as to
23 how long in seconds or minutes officers were
24 supposed to wait between the announcement and
25 using force to enter a residence.

1 Is that Metro's position?

2 A On -- given the exact time before, no.

3 Q Okay. I'll hand you what we've marked
4 as Exhibit 3.

5 (Exhibit 3 was identified.)

6 BY MR. BREEDEN:

7 Q Just for the record, Exhibit 3 is some
8 guidance from the Nevada Commission on Peace
9 Officers Standing -- Standards and Training, or
10 Nevada POST, and it's been produced in this
11 litigation as Williams 809 and 810.

12 Have you ever seen this document before?

13 A I have.

14 Q Okay. Would you agree with me that
15 somebody who's in charge of tactics and training
16 of SWAT officers should be familiar with POST's
17 guidance on those issues?

18 MR. ANDERSON: Objection. Form.

19 THE WITNESS: Again, our -- our SWAT
20 policy covers state and federal law, and then it
21 comes to -- there's some standards that -- in the
22 POST that not every officer may read every single
23 section of a POST requirement.

24 BY MR. BREEDEN:

25 Q Well, okay.

1 But you would agree with me that if you
2 were in charge of training and running a SWAT team
3 in the state of Nevada, that it would be a good
4 idea to familiarize yourself with what Nevada POST
5 says about that?

6 A It would be a good standard to know what
7 Nevada POST says on a topic, but you don't -- we
8 won't base everything based on POST. But your
9 question -- your -- I guess your question was,
10 should persons be -- in the training, be familiar
11 with everything that constitutes our deployment.
12 I would agree with you.

13 Q Prior to the incident in this case, were
14 officers trained on this Nevada POST guidance
15 about knock and announce?

16 A Prior to, I couldn't -- can't recall. I
17 don't -- through my research of looking at the
18 manual and lesson plans, I don't believe that this
19 was instituted in any training prior to this
20 incident.

21 Q And so Nevada POST, at the bottom of the
22 first page here in a little note, it states that,
23 you know, the time that is considered reasonable
24 is going to depend on the circumstances, but then
25 it says approximately one minute would be

1 considered in -- safe in most cases.

2 That guidance was never provided to SWAT
3 officers before Mr. Williams' shooting; correct?

4 A Where -- where -- what paragraph is
5 that?

6 Q I'm sorry. It's at the very bottom here
7 in this notes section on the first page.

8 A Okay.

9 Q You would agree with me that SWAT
10 officers before the -- Mr. Williams' shooting were
11 never trained on this one-minute standard?

12 A Correct.

13 Q Do you think that's a good standard
14 there? It says, "Approximately one minute would
15 be a safe period in most cases, but it can be
16 less, especially if peace officers know that
17 somebody is aside -- inside and awake."

18 Do you agree with that?

19 A I don't know who came up with the one
20 minute, because, again, through any case law,
21 state law, there isn't any specific mentioning of
22 you have to wait one minute in most cases, like
23 this refers to. I don't know who would -- who put
24 this in here, where it originated from, how long
25 it's been in there.

1 But, again, I think they're using the
2 one minute as reasonableness, and then they leave
3 it open to in most cases. So -- and then it says,
4 "But it can be less," so I don't -- again, it's
5 still ambiguous, because it leaves what's less.

6 Q Well, it gives at least some guidance to
7 officers; right?

8 A This POST standard?

9 Q Yes.

10 A It would -- yes, based on that language.

11 Q And does Metro want to do the bare
12 minimum to comply with the constitutional
13 standards, or does Metro want to do what's safest
14 for its own officers and members of the public?

15 MR. ANDERSON: Objection. Form.

16 THE WITNESS: Again, we base our
17 tactics on every situation. There could be some
18 situations that we wait one minute. There would
19 be some situations where we wait six seconds, like
20 this incident was.

21 BY MR. BREEDEN:

22 Q And the example given here in the Nevada
23 POST for when less time might be appropriate is if
24 peace officers know that someone is inside and
25 awake.

1 But that was not the case with
2 Mr. Williams; correct?

3 A Based on what the POST is saying here,
4 if -- if they're giving a factor of less than one
5 minute if someone is inside and awake, I don't
6 know if the operators outside would know that at
7 that time. They could not know that.

8 Q Well, yeah, because, in fact, they --
9 they didn't know if -- they didn't know who the
10 occupants were, if any, and they didn't know where
11 they were inside, and they didn't know whether
12 they were asleep or awake.

13 Isn't that all true?

14 A I would say that's true.

15 Q Now, knock and announce says that
16 officers have to at least perform the announcement
17 and then wait a reasonable amount of time for
18 somebody to come to the door and provide them
19 admittance.

20 What is Metro's position on whether or
21 not the amount of time is measured from the
22 begin -- beginning of the announcement or the end
23 of the announcement?

24 A Metro's position would be the -- at the
25 very onset of the first announcement is when the

1 time starts.

2 Q Okay. So if the idea is for the
3 announcement to give somebody an idea of who is
4 outside their door and why they're there, how
5 could somebody know that at the beginning of the
6 announcement before the announcement is completed?

7 A The -- the announcement -- the beginning
8 of the announcement gives the verbal announcement
9 of authority and purpose, and then it's given
10 throughout the entirety of the search warrant. So
11 we base our time, again, on the start of the
12 announcements --

13 Q Okay.

14 A -- for the reasonableness of time, based
15 on when -- what the tactic is dictating.

16 And then we -- going back to this case,
17 it was a CET, and they planned for the two
18 announcements prior to the introduction -- the
19 introduction of the stun stick and then the manual
20 breach to enter the residence.

21 Q So I want to give a hypothetical -- a
22 hypothetical fact here to make sure that we're
23 talking about the same thing and we're on the same
24 page.

25 A Mm-hmm.

1 Q I want you to imagine that the
2 announcement maybe was rather long and drawn out
3 and maybe the announcement was, "This is
4 Sergeant Backman of the Las Vegas Metropolitan
5 Police Department. I am here for 3050 South
6 Nellis Boulevard, Apartment 25. We are police,
7 and we have a search warrant." That's the
8 announcement.

9 So it's Metro's position, then, that you
10 would start counting the reasonable amount of time
11 from when the word "this" was said at the
12 beginning of that announcement, versus when the
13 announcement is complete?

14 A So the reasonable amount of time -- the
15 time that we start is, yes, at the start of the
16 announcements.

17 Q Okay. So, in my example -- which is
18 kind of a long announcement, admittedly --
19 theoretically, three or four seconds could go by,
20 and I'm still not even done with the announcement.

21 A I don't understand the question.

22 Q Well, Metro is saying -- let's say
23 Metro's policy is, "Well, we're going to do the
24 announcement and wait three seconds before we use
25 force." If I start to say, "This is

1 Sergeant Backman of the Las Vegas Metropolitan
2 Police force," and I -- and I say it in a slow
3 manner, three seconds might go by before I've even
4 finished the announcement.

5 And it's Metro's position that that's
6 okay?

7 A Again, we're going back to -- to
8 constitutional law and state law of
9 reasonableness, the amount of time. We still
10 are -- don't have any specific guidance that it
11 says you need exactly when to -- to start your
12 counting of your -- of the timing of before or
13 after. They used the reasonable amount of time at
14 the start, and they used two announcements prior
15 to insertion of the stun stick.

16 Q Well, they actually used as their
17 trigger the end of the second announcement; right?
18 I mean, it was preplanned that they would break
19 out the back window on the end of the second
20 announcement; right?

21 A Correct.

22 Q Okay. Why wouldn't they have said,
23 "Well, we'll -- we'll preplan at the -- at the
24 beginning of the second announcement"?

25 A I'm sorry. I didn't -- the -- why

1 wouldn't they plan? I'm sorry. Can you --

2 Q Yeah. Well -- well, the answer seems to
3 me -- and I don't mean to be argumentative.

4 A No.

5 Q But they waited for the announcement to
6 end because even they thought it was reasonable
7 that they should wait until at least the
8 announcement was finished.

9 Isn't that what they actually did?

10 A So the plan that was -- that was briefed
11 was they would give two announcements of the
12 authority and purpose prior to the insertion of
13 the stun stick, prior to them making the manual
14 breach to enter the residence, correct.

15 Q Okay. So you're here saying today,
16 well, we would measure that time from the
17 beginning of the announcement, but Metro's own
18 trigger that day or that morning was the end of
19 the second announcement; right?

20 A The -- the option to deploy the stun
21 stick was -- was a tactical planning at the end of
22 the second announcement.

23 Q At the time, what were Metro's policies
24 and procedures as to how it determined when
25 warrants were high risk?

1 A High risk would -- would be the crime
2 itself, if they're likely to be armed. There's
3 some other factors. I'm just drawing a blank.
4 I'm sorry.

5 Q Well, the crime that they were
6 investigating -- and, incidentally, as it turned
7 out, they -- they weren't even investigating the
8 people who committed this crime. They had the
9 wrong suspects, apparently, because they've
10 arrested somebody else for the crime now. But we
11 were investigating a homicide.

12 Is it Metro's policy or practice that
13 any homicide warrant service is considered high
14 risk?

15 A If we were going -- so that's -- that's,
16 like, a -- a huge question. Like, any homicide
17 investigation, it depends what we were going
18 after. If we were going after documents in a
19 building that would help the detectives in their
20 investigation, could be not deemed high risk
21 because we were going after documents at a
22 different facility.

23 This particular incident, there was
24 belief that there may be a suspect still that they
25 believed was a person of interest that was

1 involved in the homicide they were investigating
2 that was not accounted for and believed to have
3 been staying at that residence.

4 Q But I'm -- I'm trying to figure out why
5 the -- the warrant in this particular case was
6 considered high risk.

7 Was it merely because a homicide was
8 being investigated, or were there other factors?

9 A The factors that it was deemed high risk
10 is because the person that they -- the individuals
11 that they believed were the suspects at the time
12 of the homicide both had violent histories and
13 known to carry weapons, and they did not know if
14 they were going to be inside or not.

15 Q Now, almost a year prior to
16 Mr. Williams' death, there was another incident on
17 January 5th of 2021 which occurred at 27 East
18 Agate Avenue, and it involved a woman named
19 Jasmine King.

20 Just generally, what -- what occurred
21 during that incident?

22 A From my reading of the reports -- again,
23 I was not assigned to the SWAT section, but they
24 used a CET on the service of a search warrant. It
25 stemmed from a sexual assault investigation. They

1 utilized an explosive breach of the front door.
2 The explosive breach was initiated and ended up
3 injuring -- severely injuring a female that was
4 behind the door.

5 Q And that female was Jasmine King?

6 A Yes.

7 Q And so, like in Mr. Williams' case,
8 members of SWAT were accused of violating the
9 knock and announce rule and not waiting a
10 reasonable amount of time for somebody to come to
11 the door and provide them admittance; is that
12 true?

13 A They were deemed at the -- the
14 initiation of the charge was before the reasonable
15 amount of time. It was -- it was given too early.

16 Q And, in fact, Ms. King, she was not a
17 suspect in any crime; correct?

18 A I don't believe so. She was not named
19 in the --

20 Q She was an innocent bystander; right?

21 A Yes. She was an occupant of the
22 residence.

23 Q She was inside a residence with
24 children, wasn't she?

25 A I believe she had one child in there.

1 Q And the suspect wasn't even inside, was
2 he?

3 A No.

4 Q And Ms. King was actually trying to
5 answer the door to see, you know, police and --
6 and let them inside when this happened; right?

7 A Yes, after the first announcement. And,
8 again, it goes back to the ignition [sic] of
9 the charge was not properly utilized, which was
10 briefed prior to. It would be at the second
11 announcement.

12 Q Do you know how long in seconds between
13 the announcement and when that charge went off was
14 allowed?

15 A After -- the actual incident itself?

16 Q Yes.

17 A The -- it was immediately after the
18 first announcement.

19 Q So no time?

20 A I believe there was no time after.

21 Q Okay. And Ms. King was significantly
22 injured as a result?

23 A Yes.

24 Q Okay. Do you know, because I -- I only
25 know, like, what's in the public filings, but what

1 were the extent of her injuries?

2 A Again, I don't know. I know -- I
3 believe injury to one of her eyes.

4 Q Was she permanently blinded?

5 A I don't know. I didn't read her medical
6 records. But I believe she had significant damage
7 to one of her eyes.

8 Q And that incident, another incident a
9 year prior, where the SWAT team has been accused
10 of failing to abide by the knock and announce
11 rule, that involved many of the same people who
12 are defendants in this case; right?

13 A I --

14 MR. ANDERSON: Objection. Form.
15 Go ahead.

16 THE WITNESS: I do know Garth Findley
17 was there and James Bertuccini.

18 BY MR. BREEDEN:

19 Q And Melanie O'Daniel as well; right?

20 A Correct. Melanie O'Daniel was the
21 tactical commander.

22 Q Okay. And then, ultimately, that case
23 was resolved through a settlement for a
24 substantial amount of money; is that true?

25 A It was settled.

1 Q Okay. In investigating the Jasmine King
2 incident, did Metro determine that officers had
3 violated her civil rights?

4 MR. ANDERSON: Objection. Form.

5 THE WITNESS: They evaluated that the
6 initiation of the -- of the explosive breach was
7 not consistent with the preplanning of the two
8 announcements.

9 BY MR. BREEDEN:

10 Q Okay. So, you know, the question,
11 again, just to state it more bluntly: They found
12 that the complaint that alleged her civil rights
13 had been violated had merit?

14 MR. ANDERSON: Objection. Form.

15 THE WITNESS: Again, I don't think
16 that it was a CIRT process in this incident, so
17 I -- I don't recall reading a report that
18 distinguished otherwise. I do know that it was
19 brought to court based on her injuries. But,
20 again, I can't answer to what the findings were,
21 because there wasn't a similar investigation as in
22 Mr. Williams' case.

23 BY MR. BREEDEN:

24 Q Was there any discipline of any of the
25 SWAT officers involved in the King incident?

1 A I believe Garth Findley received a
2 contact for failing to wait for the second
3 announcement to deploy the explosive breach.

4 Q Okay. And Sergeant Findley was actually
5 the -- was he the team leader or assistant team
6 leader on Mr. Williams' warrant?

7 A He would be a team leader on
8 Mr. Williams.

9 Q Okay. So Sergeant Williams, the team
10 leader who was physically there and he's supposed
11 to be the one in charge of Mr. Williams' incident,
12 only a year prior, he had been found that he made
13 some policy violations and some errors that
14 resulted in Ms. King's injuries; correct?

15 MR. ANDERSON: Objection. Form.
16 Go ahead and answer.

17 THE WITNESS: Sergeant Findley, yes.

18 MR. ANDERSON: Just for the record,
19 you said "Sergeant Williams" a couple of times.

20 MR. BREEDEN: Oh, I'm so sorry.

21 MR. ANDERSON: Yeah, I know you meant
22 Sergeant Findley.

23 MR. BREEDEN: Yeah, I meant
24 Sergeant Findley.

25 THE WITNESS: Sergeant Findley, yes,

1 he was disciplined at the Jasmine King, referenced
2 the early deployment of the explosive breach, and
3 he was a team leader at the Mr. Williams incident.

4 BY MR. BREEDEN:

5 Q As a result of the Jasmine King
6 incident, what policies, procedures, or practices
7 were changed at SWAT?

8 A There were several based on the
9 deployment of the explosive breach. It was
10 solidified that it would not go prior to the two
11 announcements. We utilize a technology called the
12 WolffTracker that we deploy prior to hanging an
13 explosive breach charge to kind of tell us if
14 there's movement behind the door of the structure
15 that we're putting the charge on, and I believe it
16 had to be approved at a higher level.

17 Q Weren't there changes to the SWAT manual
18 about CET and when it could be used?

19 A I believe there was verbiage changed --
20 I believe there was a word "never" changed, but I
21 don't believe the -- there was much change other
22 than some verbiage of when you could -- I think
23 that was the change for the property.

24 Q What happened around this time regarding
25 SWAT's policies and procedures as to using CET for

1 a property-only search warrant?

2 A I believe the change was there had to
3 be -- when we're talking about property only, it
4 had to be other mitigating factors to use CET, so
5 it had to be the likelihood of the armed -- armed
6 subjects inside.

7 Q Was CET at any point completely banned
8 for a property-only search warrant?

9 A CET should not be used for property-only
10 search warrants if you don't have mitigating
11 factors.

12 Q Okay. And so what are the mitigating
13 factors?

14 A You don't have a --

15 Q I think maybe you mean aggravating
16 factors.

17 A Or aggravating factors. The likelihood
18 of suspects being armed, violent -- violent
19 suspects, prior history, stuff like that.

20 Q And the search warrant regarding the
21 residence where Mr. Williams was ultimately
22 killed, that was a property-only search warrant;
23 right?

24 A The search warrant for Mr. Williams, it
25 was for the recovery of evidence related to a

1 homicide, but it also named two -- two individuals
2 who, one was on a monitor, monitoring through
3 CCDC, Clark County Detention Center, so we knew he
4 wasn't at that residence. And the other suspect
5 who had a violent history, who had been
6 investigated by gangs for an outstanding
7 shooting -- he was wanted in an outstanding
8 shooting -- possible could be in there. So we
9 still had knowledge that there could be a violent
10 criminal inside that residence, but --

11 Q Okay. But the warrant itself was a
12 property-only search warrant? There was no arrest
13 warrant?

14 A The -- the -- there was no arrest
15 warrant, and the arrest -- the search warrant did
16 not name a body up to seize.

17 Q Okay. So what -- what policy changes,
18 then -- you know, I just want to make sure that
19 we've discussed them all.

20 What are all of the policy changes that
21 happened because of the Jasmine King incident?

22 A The Jasmine King was more of an
23 explosive breaching policy changing of when we
24 would utilize the explosive breaching, how we
25 would announce explosive breaching. We added in

1 factors of staying away from the door, and we
2 added in technology to try to ascertain if there
3 was somebody standing behind the door. And then
4 the approval process.

5 MR. BREEDEN: Let's go off the record
6 for a moment.

7 THE VIDEOGRAPHER: The time is
8 12:00 p.m. We are off the record.

9 (Whereupon, a recess was taken.)

10 THE VIDEOGRAPHER: The time is
11 12:59 p.m. We are on the record.

12 BY MR. BREEDEN:

13 Q Okay. Lieutenant Beas, we're back on
14 the record now, and we want to talk some about
15 Metro's post-incident knock and announce policies.

16 I'm going to go through some particular
17 subjects, but how have Metro's policies regarding
18 knock and announce and CET service of warrants
19 changed since the Williams shooting incident?

20 A Again, when CIRT reviewed the case with
21 their legal consultant, they said that some
22 language in the CET policy, specifically the
23 speed, surprise, and overwhelming action, kind of
24 contradicted the reasonableness of time. They
25 wanted to move the CET option to a no knock.

1 And after then-Director Peterson
2 consulted with them, we changed the policy to a
3 CET to be only allowed when a no-knock search
4 warrant is approved, and it has been to be
5 approved by the captain or director of SWAT.

6 Q Even under the policies at the time, if
7 Metro had sought a no-knock warrant for the search
8 warrant at the apartment where Mr. Williams was
9 staying, do you think that would have been
10 approved as a no-knock warrant?

11 A The -- the detective that was typing
12 it -- this Detective Grimmett that was the affiant
13 of the search warrant would have to ask the court
14 for a no knock. I don't know what his -- the full
15 investigation of it was, but the severity of
16 crime, if -- I don't know if this one would be
17 just based on the details that were put into this
18 search warrant after reading it.

19 Q So are you familiar with the case of
20 Breonna Taylor?

21 A Yes, the national case?

22 Q Yes.

23 A Yes.

24 Q It's a national case, I think out of
25 Kentucky.

1 A Kentucky.

2 Q And in that case, there was a lot of
3 criticism of law enforcement's use of a no-knock
4 warrant; would you agree?

5 A Yes, no knocks were criticized, but I
6 don't believe Breonna was a no knock, but that
7 was -- it brought the no-knock search warrants to
8 light.

9 Q And so there had been some changes after
10 that incident to Nevada law in order to limit
11 no-knock warrants; right?

12 A Yes.

13 Q Okay. And at the time the Williams
14 incident occurred, were no-knock warrants very
15 common here, used by Metro?

16 A No, no-knock warrants have never been
17 really common, and especially here in -- in Metro.

18 Q Is there sort of a -- an informal policy
19 that they are not to be used?

20 A No. I just think the way that the
21 process is for the search warrant -- because a
22 no-knock search warrant would be more of a tactic,
23 and when they -- when the affiant of a section or
24 a bureau that's authoring the -- the search
25 warrant, sometimes they don't meet with SWAT prior

1 to the implementation of the warrant, so they
2 wouldn't know that we may want a no-knock search
3 warrant because it's not approved -- or it's not
4 requested by us; it would be requested by the
5 detective.

6 I don't see anything that was formal or
7 informal with the department saying they did not
8 want to do them. They're just very uncommon.

9 Q When is the last time you, as SWAT
10 tactical commander, have approved a no-knock
11 warrant?

12 A I have never approved a no-knock
13 warrant. Or let me back up. Again, I don't
14 know -- I don't approve the -- the application for
15 a no-knock warrant. If it came as a warrant to me
16 to approve for the service of it and it said no
17 knock, then I would have to prove that tactic, but
18 I've never had a warrant come to me as a no-knock
19 search warrant.

20 Q Okay. Are you aware of the last time
21 SWAT did serve a warrant as a no-knock warrant?

22 A I can't recall.

23 Q Would you agree with me that the smaller
24 the amount of time that officers wait between
25 announcements and use of force, the closer it gets

1 to being, in practical effect, a no-knock warrant?

2 A I would say they're two distinguished
3 tactics. The no knock is zero announcements, zero
4 time before manually breaching the door. And then
5 when you get to the CET or a SACO, the
6 reasonableness of time is based on your incident
7 at the time, your information, your intel that you
8 have.

9 Q But if I went to serve a warrant and,
10 you know, on my way kicking down the front door, I
11 just said, "Police, search warrant," that's
12 essentially a no-knock warrant, isn't it?

13 A It would be still an announcement. The
14 reasonableness of time would be you would have to
15 articulate why you kicked it after really quick
16 announcement.

17 Q Yeah, there -- that would be sort of
18 token efforts to give the announcement; right?

19 A Based on your -- your hypothetical, yes.

20 Q Yeah.

21 And Metro doesn't want token efforts to
22 comply with the law. They want to comply with the
23 law; right?

24 A Yes.

25 Q They want to comply with the

1 Constitution and the spirit of the law; correct?

2 A Correct.

3 Q You indicated that after the Williams
4 event, the policy on CET was changed then and CET
5 is now only to be used with the no-knock warrants.

6 Were there any other changes to policy
7 that were implemented?

8 A Reference to CETs or SACOs or --

9 Q CET, SACO, or how knock and announce is
10 performed.

11 A No. Other than moving the CET to a no
12 knock, we just have more discussion about
13 reasonableness of time given certain factors.
14 It's still -- we still abide by the same
15 pre-policies prior to it, but now that we -- we
16 have not used a CET post this incident, most -- or
17 I don't want say most -- all of our search
18 warrants have been either that SACO or a modified
19 SACO that gives us more time to announce, just
20 based on how far away we are and the actual tactic
21 of not going in.

22 Q So if SWAT served the warrant involved
23 in this case today, there would be no dispute,
24 this would simply be served as a SACO?

25 A It would -- if it was served today, it

1 probably would be either a SACO, because it was
2 no -- a no-knock search warrant, or a breach and
3 hold, where we would not enter the threshold with
4 bodies.

5 Q Okay. And let's talk about some of
6 those other options.

7 First of all, there's a no-knock warrant
8 or -- well, no, I should phrase it this way.

9 There's a CT -- CET entry, which is now
10 reserved only for no-knock warrants; correct?

11 A Correct.

12 Q There's SACO.

13 There's an option, if officers don't
14 feel they can safely serve the warrant, to simply
15 not execute the warrant at that moment; right?
16 That's always an option?

17 A That's always -- that's always been an
18 option, even previously. If -- if we believe that
19 there's other options for -- to surveil the
20 suspect out and get them into custody, based on
21 probable cause or an arrest warrant, to take them
22 into custody and then now serve that with the
23 suspect away. That was -- that's an option before
24 and now.

25 Q And you said there's a breach and hold

1 option. So explain what that option is and when
2 that would be used.

3 A Again, that's another tactic used in
4 service of search warrants where environmental
5 factors and -- that limit our -- unable to contain
6 it safely for the citizens and officers, that we
7 would get up to the threshold and breach a door
8 and/or window to kind of get a foothold into the
9 structure without actually making entry into the
10 structure with bodies.

11 But, again, that's based on size of the
12 structure, the case, what the search warrant is
13 for. Obviously, you couldn't do it for a
14 3000-square-foot house, because there's no way to
15 have fully contained that house on a breach and
16 hold. So it's case-by-case basis.

17 But it gives you an option, if you can't
18 properly -- because there's some apartment
19 complexes, townhouses, condominiums that you can't
20 safely SACO it. That gives them -- operators
21 another tactic without using a dynamic entry.

22 Q Would -- would breach and hold have been
23 an option for the warrant involved in this case?

24 A I don't believe the -- the SWAT manual,
25 they trained breach and holds. Their options were

1 CET or SACO at the time. There might have been
2 some informal breaching and holding, but I don't
3 know if they trained it and formalized it in
4 the -- or in the SWAT manual.

5 Q But at least at the time this incident
6 occurred, a breach and hold was at least a --
7 informally could be used?

8 A I don't believe they trained it as -- to
9 the point where they were implementing that tactic
10 at the time.

11 Q Okay. Given that they didn't know who
12 was inside, and I don't even think they knew
13 whether people were inside, why wouldn't they
14 maybe use a breach and hold here so that, you
15 know, people inside would have time to come out
16 willingly?

17 A Again, I think it goes back to that
18 wasn't a trained tactic that was put into policy
19 or our SWAT manual, and their options that they
20 used at the time were CET or SACO, and those were
21 the ones they trained and were comfortable with
22 and were tried and true methods.

23 Q Okay. The Ninth Circuit has listed the
24 time of day that the warrant is served as a factor
25 into how long it is reasonable for officers to

1 wait between the announcements and the time that
2 they use force to enter a residence to serve a
3 warrant.

4 Metro accepts that as a legal factor to
5 apply here; correct?

6 A Correct.

7 Q And is that specifically taught to SWAT
8 officers?

9 A Yeah, that is in -- it's in the manual.
10 Time of day is a factor in any service of search
11 warrants, along with all of the other facts that
12 we've talked about.

13 Q And the way the factor applies is that
14 if the time of day is a time where people are
15 likely to be asleep, the amount of time that
16 officers should wait should be longer; is that
17 true?

18 A Minus any information that -- given a
19 24-hour town, minus any information that the
20 occupants that you're seeking to encounter are not
21 that type of individual that, you know, have that
22 pattern of life. That's something to factor in,
23 correct.

24 Q Okay. And also we have the problem like
25 if these warrants are served when people are

1 likely to be asleep, like the early hours of the
2 morning, some people sleep naked or in a state of
3 undress that they wouldn't necessarily want to
4 just jump up out of bed and come to the door
5 first.

6 Does Metro acknowledge that?

7 A Again, that would be factored into the
8 time of day, yes.

9 Q Okay. Is -- do you remember the actual
10 facts of the Banks case?

11 A That he was in the shower at the time of
12 North Las Vegas SWAT serving the search warrant,
13 and he believed he didn't have enough reasonable
14 time to get out of the shower and answer the door.

15 Q Yeah. So -- so that -- that factor is
16 literally the factor from Banks, right, that
17 police ought to wait long enough for people to get
18 decent and come to the door; right?

19 A Again, in that case, I think it -- it --
20 it alluded to the reasonableness of time to -- to
21 announce minus anything -- factors of destruction
22 of evidence, possible escape, and any other
23 factors that they -- that they come into encounter
24 with.

25 Q And does Metro acknowledge that the six

1 seconds, then, that was afforded Mr. Williams
2 was -- was not a reasonable amount of time?

3 A In the CIRT review, they -- they note
4 that -- that the six seconds and the time of day
5 probably wasn't proper.

6 Q And you're not disputing that finding
7 here today?

8 A No.

9 Q Okay. Another one of the factors that
10 is mentioned in the Banks case is the officer's
11 other observations that would support forced
12 entry. In Mr. Williams' specific case, and I --
13 I've -- me and my law partners have taken many
14 depositions in this case, and not one witness has
15 testified that they saw or heard anyone moving or
16 doing anything inside the apartment before force
17 was used to enter it.

18 So would you agree with me that that
19 factor, the officer's other observations, that
20 would not support a shorter amount of time?

21 A The -- going off the statements of the
22 officers that you had deposed, that they said they
23 didn't hear anything or see anything that would
24 speed up that six seconds, again, it goes back to
25 the preplanning of the actual briefing of the

1 search warrant was the information that there
2 could be occupants in there that were armed with
3 firearms.

4 And they used the two announcements.
5 And, again, we explained the stun stick so they
6 didn't give them time to arm themselves or
7 barricade or do any other factors.

8 Q Is there any period of time in seconds
9 that Metro considers, per se, meaning in and of
10 itself, not to be a reasonable amount of time to
11 wait?

12 A Again, it would be -- it would be based
13 on the incident in itself and the factors that
14 the -- the operators, the ATL, the TL see at the
15 time of the service that would factor in, if it
16 would need more time than prior briefings or less
17 time.

18 Q And, you know, the reason why that
19 factor is there so that if police go to serve the
20 warrant and then, all of a sudden, like, they see
21 somebody peeking behind a curtain with a gun and
22 they say, like, "Oh, it's police; hide," or, "Oh,
23 it's police; jump out the back," then that's --
24 that's the type of factor that would encourage a
25 shorter amount of time; right?

1 A Shorter amount of time than was briefed,
2 yes.

3 Q Yes.

4 And so, even though there could be later
5 changes to what is considered reasonable, is there
6 some amount in seconds that Metro considers, at
7 least at the planning stage, that officers need to
8 wait at least that amount of time?

9 A Again, there's nothing formally written
10 or within U.S. or state law that -- that mandates
11 a -- a specific time. Again, it's based on the
12 preplanning of the actual search warrant of what
13 they're -- potentially could encounter, based on
14 the investigation, that the ATLs and TLs come up
15 with their plan of how many announcements.

16 And in this case, they gave two
17 announcements, which was pretty much accepted
18 announcements, prior to making any forcible entry
19 or start the process of entry.

20 Q Are you aware of any amount of time that
21 the Ninth Circuit Court of Appeals has itself
22 stated it has never upheld entry in a shorter than
23 that amount of seconds as constitutional?

24 A Ninth Circuit does cite -- in the Banks
25 case, it cites 15 to 20 seconds. That was that

1 case specific. And then there's also cases that
2 less than five seconds is not reasonable.

3 Q Okay. Has any Ninth Circuit case ever
4 held that less than ten seconds was reasonable --

5 MR. ANDERSON: Objection. Form.

6 BY MR. BREEDEN:

7 Q -- as far as you are aware?

8 A Off the -- offhand right now, I know
9 I've read some stuff, but I can't recall the
10 actual case.

11 Q And in Banks, there was reference to a
12 15- to 20-second delay, and Metro would agree that
13 less than 15 to 20 seconds was used in the
14 Williams matter? In fact, the -- six seconds is
15 the figure Metro is giving; correct?

16 MR. ANDERSON: Objection. Form.

17 THE WITNESS: So six seconds was the
18 stun stick entry, and then the entry was after
19 that. So I believe breaking the threshold and
20 entry was after 15 seconds.

21 BY MR. BREEDEN:

22 Q Okay. But -- but let's be clear.

23 Metro understands that the first use of
24 force to enter the apartment was when the back
25 window was broken with the stun stick? Does Metro

1 agree with that?

2 A Correct. Correct.

3 Q Okay. Does Metro agree that mistakes
4 were made when the warrant was served on the
5 apartment that Mr. Williams was in?

6 MR. ANDERSON: Objection. Form.

7 THE WITNESS: You would have to be
8 more clear as far as "mistakes."

9 At the service from SWAT or the -- or
10 the search warrant itself?

11 BY MR. BREEDEN:

12 Q I'm happy to clarify for you, but -- but
13 I want to ask the question very broadly.

14 A Okay.

15 Q Okay?

16 Does Metro in this litigation admit that
17 there were any failures of training, policy,
18 planning, or execution regarding this warrant?
19 And, if so, what are they?

20 A Well, again, the CIRT -- in reading the
21 CIRT report, there was findings, again, going back
22 to the -- sorry -- the verbiage of the CET
23 contradicted that they said reasonableness of
24 time. That's why it was changed. I know they
25 said that Melanie O'Daniel's approval of the stun

1 stick was not in line with policy, given that they
2 believed they couldn't clearly see what was behind
3 that window.

4 There was some talks about there wasn't
5 enough surveillance to ascertain who was actually
6 going to be in that residence, if there was going
7 to be young children or older adults and who was
8 in the residence prior.

9 Q Does --

10 A So things like that.

11 Q Does Metro agree there were failures of
12 surveillance?

13 A They said there should have been more
14 surveillance needed.

15 Q Yeah.

16 Because when this was actually served,
17 Metro had no idea who was actually in the
18 apartment; right?

19 A So the surveillance was conducted, and
20 the surveillance team that conducted the
21 surveillance believed that it was too, I guess --
22 I don't want to use the word "dangerous," but they
23 were compromised believing there was too many
24 lookouts. Believing that this was a dope house
25 for sale, and they had a lot of lookouts, they

1 couldn't use physical surveillance. There wasn't
2 technology to use based on the -- the layout of
3 the residence.

4 And, yes, they -- they did not know
5 fully who would be in there. There was knowledge
6 based on the -- the suspected person at the
7 time's, I believe, stepmother that she said that
8 he stayed there, but he was never seen on
9 surveillance.

10 Q Yeah, so one suspect they were looking
11 for, he was wearing an ankle monitor, so they knew
12 he was not there; right?

13 A Correct.

14 Q And the other suspect had never actually
15 been seen there by surveillance; they just had
16 information from his stepmother from some months
17 before that he might be at that apartment?

18 A That information and then the
19 information that he was involved in a shooting in
20 the same complex, yes.

21 Q But police surveillance never actually
22 had eyes on him at that apartment at any time, let
23 alone the morning of the shooting; right?

24 A Correct.

25 Q Okay. And Metro does not dispute the

1 findings of the CIRT report, that there were
2 failures in surveillance?

3 A They noted that there was -- there
4 should have been more surveillance done, correct.

5 Q Does Metro dispute the findings of the
6 CIRT report that the IAPs were improperly handled?

7 A No.

8 Q Does Metro dispute the findings of the
9 CIRT report that there was inadequate training in
10 the sense of Sergeant Backman, who had not
11 completed basic SWAT training course at the time
12 this happened?

13 MR. ANDERSON: Objection. Form.

14 THE WITNESS: I believe they did state
15 that he should have been through a SWAT school,
16 but I believe Melanie O'Daniel had offered him
17 some other training, and given his background and
18 experience, he was in that foreposition.

19 BY MR. BREEDEN:

20 Q Yeah, he had -- he had somewhat of a
21 leading role in this, didn't he? Like, it was his
22 job to do the announcements; right?

23 A Correct.

24 Q And he actually took on a planning role
25 as well with Lieutenant O'Daniel, because the

1 regular team leader, Sergeant Findley, was on
2 vacation; correct?

3 A He -- he was -- the initial planning was
4 the ATL, and he gets the -- he approves that
5 planning, and then he briefs it up to
6 Lieutenant O'Daniel, correct.

7 Q Because Sergeant Backman had not even
8 completed the basic SWAT training course, he
9 wouldn't have even seen Exhibit 2, would he?

10 MR. ANDERSON: Objection. Form.

11 THE WITNESS: No, part of the -- part
12 of his role as a team leader, he should be aware
13 of all section policies, even day one.

14 BY MR. BREEDEN:

15 Q Well, do you know for a fact that he had
16 seen that, or are you just speculating?

17 A I don't know for a fact, but I'm just
18 saying, based on any position that you take to --
19 for a new position, you should know what you're
20 entailing, and that's part -- part of that is
21 reading the section manual.

22 Q But we know, because he hadn't completed
23 the training, he wouldn't have seen any of the
24 PowerPoints used during the basic training and he
25 wouldn't have received any of the verbal

1 instruction given during the basic training on
2 knock and announce; true?

3 A Again, I think Melanie O'Daniel stated
4 that he had some training, some one-on-one
5 training, so I don't know what that entailed, if
6 he had to see some PowerPoints or he had to read
7 the manual. But I know she alluded to that he did
8 have some one-on-one training. I believe it was
9 40 hours. But you are correct, he did not go
10 through the full SWAT school, the 120 that was
11 offered at that time.

12 Q And CIRT had found that
13 Lieutenant O'Daniel's approval of the stun stick
14 and the charge that was in the stun stick was not
15 to department policy.

16 Does Metro dispute that in this
17 litigation?

18 A No.

19 Q Okay. CIRT had found that use of the
20 CET entry was contrary to knock and announce
21 principles.

22 Does Metro dispute that conclusion in
23 this litigation?

24 A I think the findings were they did not
25 believe it was within the SWAT policy to use the

1 CET, correct.

2 Q Okay. And ultimately, related to that,
3 CIRT concluded that officers had not waited a
4 reasonable amount of time when conducting the --
5 the knock and announce portion of the warrant
6 service.

7 Does Metro dispute that in this
8 litigation?

9 A I believe that came from the legal
10 consultant and was ultimately put into the report,
11 so, yes, they -- they took that report.

12 Q Okay. Metro, in this litigation, is not
13 disputing that?

14 A No.

15 Q Is the SWAT manual updated or revised
16 annually?

17 A I can't say, prior to the -- me taking
18 over, if it was yearly. The department does want
19 you to review the section manual yearly to see if
20 there needs to be any changes. There has been,
21 since I've been there, two versions of it, and as
22 we go and implement new -- new pieces of
23 equipment, new tactics, we add in those policies.

24 Q Okay. So the version in effect at the
25 time of the search warrant in this case was the

1 2021 version?

2 A Yes, it would be the '21 version.

3 Q And so what are the later versions? Is
4 it 2022 and 2023?

5 A I believe '22 it changed. And then '24
6 was a change, and then we -- it twice changed in
7 '24. It changed in January and then again in May.

8 Q Okay. And would they refer to that,
9 then, as version, like, 1/2024 and version 5/2024?
10 How is that distinguished?

11 A So they would refer to it as the month
12 that it was changed. So right now we're 5/24.

13 Q Okay. And so how are the -- the later
14 versions of the SWAT manual different? I know we
15 spoke about the change regarding CET, and that's
16 now reserved for no-knock warrants.

17 What were the other changes?

18 A We really did a revamp, because, again,
19 when -- in March or so of '23, we had a new
20 director come in, and he wanted to overhaul the
21 whole manual. So we went page by page. We took a
22 lot of stuff that didn't need to be in there out.

23 I would have to, I mean, go -- it was a
24 full change. Nothing in particular, other than
25 the CET language that we're dealing with this.

1 Dealing with tactics, that was changed to no
2 knock. And then we added the breach and hold into
3 the manual.

4 Q And so have there been any changes to
5 knock and announce principles or how knock and
6 announce is supposed to be performed?

7 A Still we abide by the laws that govern
8 search and -- search warrants and knock and
9 announce, but there's no specific -- we didn't add
10 any specific time that needed to be implemented
11 prior to entry.

12 Q Did you read Sergeant Findley's
13 deposition?

14 A I did not.

15 Q Dr. -- I'm sorry, Sergeant Findley seems
16 to reference that at one point in time, there was
17 something in writing that said at least ten
18 seconds should be allowed for a reasonable amount
19 of time to wait, and that that was changed at some
20 point.

21 Do you have any information about when
22 that changed and who changed it?

23 A I do not have any recollection of it
24 being in there that I read, but I don't -- I
25 wouldn't be able to answer that if it was in there

1 and who changed it.

2 Q So do you have any information as to why
3 it was changed?

4 A No, sir.

5 Q Do you have any information as to
6 whether it was changed to allow for longer or
7 shorter waiting times?

8 A I -- I couldn't under -- I don't know
9 when it was changed or if it was in there, so I
10 couldn't answer that.

11 Q Okay. Have any of the department's
12 policies on what constitutes a high-risk warrant
13 changed since the time this warrant was served?

14 A No.

15 Q Since the time this warrant has served,
16 has Metro made any effort to relay the information
17 from Nevada POST to SWAT, which suggests that one
18 minute is a safe period to wait in most cases?

19 A Again, we -- we know that that is in
20 there. We don't know why it's in there or who put
21 it in there, but, again, we go back off of
22 reasonableness of U.S. Constitution and state law.

23 Q What position does Metro take in this
24 litigation as to the effect that the NFDD
25 deployments had on Mr. Williams' ability to see

1 and hear officers?

2 MR. ANDERSON: Objection. Form.

3 Go ahead.

4 THE WITNESS: I can only answer to
5 what the intended use of an NFDD when it's
6 inserted into a structure, what we intend it to
7 cause, and that's to disorientate them and to take
8 his attention away from what we're actually doing.
9 I don't know -- I could not say if that was
10 actually the cause that happened to Mr. Williams.

11 BY MR. BREEDEN:

12 Q And I think you stated earlier, one of
13 the reasons you deploy an NFDD is to confuse
14 people inside the residence; is that true?

15 A To stun and disorientate them, yes. And
16 that's in the sense to take his attention away
17 from the breach at the front door.

18 Q Do you recall specifically using the
19 word "confuse" earlier in your deposition?

20 A I don't, but confusion is part of the
21 stun and disorientate them.

22 Q Okay. We have retained an expert in
23 this case who has testified that the NFDDs would
24 have impaired Mr. Williams' ability to see
25 officers in his surroundings.

1 Does -- does Metro dispute that?

2 A At the time that the stun stick was
3 deployed, there was no officers in there for him
4 to see, so I -- I don't know what the -- I
5 couldn't answer if he was -- could not see
6 officers from the outside where his positioning
7 was.

8 Q And the same expert is prepared to
9 testify that the NFDDs impaired Mr. Williams'
10 ability to hear officers.

11 Does Metro dispute that?

12 A No. Again, that's the intention of the
13 distract, is to momentarily debilitate his vision
14 and hearing.

15 Q In fact, at least as the officers are --
16 are entering, you know, they're saying things like
17 "Police, search warrant," but that's at the same
18 time the NFDDs are going off; right?

19 A That's the nine bang at the -- on the
20 outside on the four side -- or the two side.

21 Q What is Metro's position in this
22 litigation on whether Mr. Williams was impaired by
23 any substance at the time of his death?

24 A I believe the CIRT report and his
25 toxicology stated that he had marijuana in his

1 system that was consistent with smoking it
2 recently.

3 Q And recreational marijuana is legal;
4 correct?

5 A Correct.

6 Q In your experience as a police officer,
7 is it unusual to find people who have smoked
8 marijuana recently?

9 A To find them -- like, encounter people
10 that had smoked marijuana?

11 Q Sure.

12 A No, it wouldn't be unreasonable.

13 Q You could probably walk down on Fremont
14 Street and smell marijuana on half the people;
15 right?

16 A Correct.

17 Q So I say that jokingly, but do you
18 recall, like, the exact nanograms per deciliter
19 that -- of THC in his system that was tested?

20 A No. I would have to refer back to the
21 CIRT report, the toxicology.

22 Q Okay. Did you -- did you ever review
23 that section of the CIRT report, the toxicology?

24 A It was in the -- it was in the CIRT
25 report. I remember seeing it.

1 Q Did -- did you find the levels to be
2 highly unusual?

3 A I don't know levels of intoxication
4 based on nanograms. I'm sorry.

5 Q Okay. And you agree there was no
6 alcohol involved.

7 A I don't recall seeing alcohol in --

8 Q Okay.

9 A -- in the report.

10 Q Is Metro going to take the position that
11 Mr. Williams' marijuana consumption caused or
12 contributed to this incident at all?

13 A I don't think that contributed to him
14 firing on officers.

15 Q Okay. Are you -- is Metro going to take
16 the position that that caused or contributed to
17 his inability to perceive and -- and react to what
18 was going on around him?

19 MR. ANDERSON: Objection. Form.

20 THE WITNESS: I don't -- it was never
21 in the report that that would keep him from going
22 to the door or submitting or giving him a -- a
23 clear mind frame.

24 BY MR. BREEDEN:

25 Q Okay. I have seen two alternate

1 versions of the SWAT uniform and how lettering
2 appears on the uniform. One is with bright gold
3 lettering that says SWAT on it, and the other is
4 what I would call a blackout uniform that the SWAT
5 lettering is in black and therefore is much more
6 difficult to see, especially from a distance.

7 In this case, the officers were wearing
8 what I would call the -- the blackout uniforms.

9 Why was that done?

10 A We call that the subdued patches. And,
11 again, it's just a tactical advantage. When we're
12 doing hostage rescues and we have to stealth in or
13 we're doing search warrants where we have to walk
14 up to the front door, we want -- we don't want to
15 be backlit, because those other reflective patches
16 may compromise our positions with people on the
17 four side or the two side or the three side and on
18 the approach. But it's just mainly for a tactical
19 advantage reason.

20 Q Okay. It's to assist in the CET and the
21 surprise and overwhelming response; right?

22 A It's in totality of just really the
23 tactical advantage of giving us the -- not being
24 seen when we're trying to be stealthy.

25 Q Well, under knock and announce

1 principles, part of it is that the person inside
2 the residence has to be afforded an opportunity to
3 come to the door and reasonably ascertain that it
4 is officers at the door with a warrant and -- and
5 provide them entry.

6 Don't you think that that process is
7 more delayed with the blackout or subdued
8 uniforms, as opposed to the bright gold lettering?

9 A I don't, because the numerous search
10 warrants we have done that we have been able to
11 announce and get people to come to the door
12 doesn't diminish their ability to recognize the
13 verbal announcements that we are the police and we
14 have a search warrant.

15 Q Well, that assumes that the person heard
16 and understood those instructions; right?

17 A Yes.

18 Q What if it was a deaf person?

19 A They wouldn't have been able to hear us.

20 Q And what if it was a person who had
21 their hearing impaired like through NFDDs?

22 A But verbal -- I mean, the subdued
23 patches and the patches that the SWAT officers
24 wear is not -- is not the only thing that
25 announces our presence. Again, it's the visual

1 presence, it's the lights, it's the verbalization,
2 NFDDs. So it's in totality, so it's not one
3 factor that would have recognized us as police
4 officers.

5 Q Would you agree that when officers
6 actually breached the front door of the apartment
7 and physically went into the apartment, that many
8 of them had lights on the end of their weapons?

9 A I believe most of them should be
10 carrying lights. I just don't recall how many
11 had -- had them on, but there was -- there was
12 several of them on.

13 Q It's essentially like having a little
14 flashlight on the tip of your firearm; right?

15 A Correct.

16 Q Okay. How many of those do you think
17 were shining into Mr. Williams' face as police
18 came through?

19 A Again, I don't recall the number, but
20 there was flashlights.

21 Q Multiple lights; right?

22 A Correct.

23 Q Okay. Do you believe those would have
24 impaired Mr. Williams' ability to see the
25 officers?

1 MR. ANDERSON: Objection. Form.

2 THE WITNESS: Again, I think with the
3 number of bodies we had in there and the number of
4 announcements that were given prior to making
5 entry and during entry, that's our announcements
6 for authority and purpose.

7 BY MR. BREEDEN:

8 Q But at the time the shooting occurred,
9 he was essentially staring into multiple
10 flashlights on his face; right?

11 MR. ANDERSON: Objection. Form.

12 THE WITNESS: I couldn't say what he
13 was staring at at the time that he fired the
14 weapon at the officers.

15 BY MR. BREEDEN:

16 Q Does Metro think it -- the most likely
17 scenario is that when the announcements were
18 given, Mr. Williams was asleep?

19 MR. ANDERSON: Objection. Form.

20 THE WITNESS: Again, based on the
21 reports, there's no way to know if he was asleep
22 prior to the announcements. All we can say is he
23 was awake when officers made entry, because he
24 fired on officers.

25

1 BY MR. BREEDEN:

2 Q Isn't the reason why 5:00 a.m. was
3 chosen for this service of this warrant was
4 because it was a time he would most likely be
5 asleep, or any occupants inside?

6 A There's -- there's several factors that
7 go into an early morning hit. Being a
8 multi-family apartment complex, the closeness to
9 Nellis Boulevard, and AMPM, we want to reduce the
10 risk to citizens. But also, we don't want them
11 staring out the windows at us either as we're
12 making our approach.

13 Q Okay. Are you aware that a question
14 similar to that was asked at a press conference of
15 the public relations officer for Metro, and he
16 said that these are served in the early hours of
17 the morning when there's -- people are likely to
18 be asleep or not active inside?

19 A I don't recall that -- listening to that
20 press conference.

21 Q Do you agree that that's a factor that
22 Metro considers when they assess what time of day
23 they should serve these warrants?

24 A I would agree.

25 Q Is that official policy by Metro?

1 A No.

2 Q So what is Metro's policy as to why it
3 would serve a warrant at 5:00 a.m. versus serving
4 it at noon?

5 A Again, it goes -- based -- it's -- it's
6 really the safety of the community when you're
7 serving a warrant different times of the day,
8 whether you're going to do it late at night, early
9 in the morning, or during the day. We want to try
10 to lessen the citizens that are walking around,
11 kids that are going to school, and -- and also a
12 factor of the cover of darkness to give us a
13 better stealth approach to the search warrant.

14 So there's many factors other than just
15 believing that he may be asleep or not as alert as
16 the middle of the day. Again, it goes to factors
17 to the occupants, what kind of structure it is?
18 Are they -- are they a late-at-night dope sales?
19 Is it we know that they work a 9:00 to 5:00? So
20 all of those factors go into the determination of
21 when we want to serve the search warrant.

22 Q Ultimately, no evidence that was sought
23 in the search warrant was found inside the
24 apartment; correct?

25 A Reading the reports, I don't believe so,

1 yes. No, nothing was found.

2 Q And I referenced it earlier, and I'm not
3 sure if you -- you knew it or not, but, in fact,
4 the -- the two suspects that were considered at
5 that time that might be at the residence, Metro
6 has now arrested individuals completely
7 unassociated with them for the crime.

8 Were you aware of that?

9 A I'm aware that the two individuals that
10 they identified as the persons of interest that
11 were given to -- by the stepmother that may be
12 involved, based on surveillance video, were not
13 the two individuals that were arrested.

14 Q Have you seen the surveillance video?

15 A I've seen pictures of it.

16 Q It's pretty -- pretty grainy and -- and
17 difficult to make out any particular features.

18 Wouldn't you agree?

19 A If it wasn't my kid, it would be hard.

20 Q I'm going to provide you what we'll mark
21 as Exhibit 4.

22 (Exhibit 4 was identified.)

23 THE WITNESS: Thank you.

24 BY MR. BREEDEN:

25 Q Exhibit 4 are several pages from the

1 CIRT report. It's just an excerpt. They have
2 been Bates labeled LVMPD4440 through 4443.

3 These are excerpts from the CIRT report
4 that we've been talking about during your
5 deposition, and basically I -- I just want you to
6 take a few seconds to review them and let me know
7 if Metro, in this litigation, is taking any
8 position that the findings and conclusions on
9 these pages are not correct.

10 A Do you want me to start at the general
11 SWAT approach at the very top?

12 Q Yes.

13 A Okay. Do you want me to read the whole
14 thing?

15 Q Well, I want you to -- to read it at
16 least to the extent that you're comfortable
17 testifying that Metro does not dispute any of the
18 findings on those pages.

19 And I don't mean to interrupt you, but
20 then my question would be if -- if Metro intends
21 to dispute any of these findings, I need to know
22 what they are and why they are disputing them.

23 A Okay.

24 So this was the CIRT findings based on
25 our department policy, so --

1 Q So, in this litigation, is Metro
2 disputing these findings?

3 A That they're -- no, on the findings of
4 the policy violations.

5 MR. BREEDEN: Okay. I think those are
6 all of my questions.

7 Do you have anything, Mr. Anderson?

8 MR. ANDERSON: I don't.

9 THE VIDEOGRAPHER: Okay. Just
10 briefly, Mr. Anderson, would you like a copy of
11 the video and transcript?

12 MR. ANDERSON: I do want a copy of the
13 transcript. I don't need a copy of the video at
14 this time.

15 MR. BREEDEN: Thank you.

16 MR. ANDERSON: Unless you want one to
17 remember this day.

18 THE WITNESS: No.

19 THE VIDEOGRAPHER: This concludes the
20 deposition of Lieutenant Adrian Beas as a 30(b)(6)
21 designee for Las Vegas Metropolitan Police
22 Department consisting of four clips. The time is
23 1:53 p.m. We are off the record.

24 (The deposition concluded at 1:53 p.m.)

25 * * * * *

1 CERTIFICATE OF COURT REPORTER

2 STATE OF NEVADA)
3) ss:
4 COUNTY OF CLARK)


5 I, Heidi K. Konsten, Certified Court Reporter
6 licensed by the State of Nevada, do hereby certify
7 that I reported the deposition of ADRIAN BEAS,
8 commencing on March 28, 2025, at 9:04 a.m.

9 Prior to being deposed, the witness was duly
10 sworn by me to testify to the truth. I thereafter
11 transcribed my said stenographic notes via
12 computer-aided transcription into written form,
13 and that the transcript is a complete, true and
14 accurate transcription and that a request was not
15 made for a review of the transcript.

16 I further certify that I am not a relative,
17 employee or independent contractor of counsel or
18 any party involved in the proceeding, nor a person
19 financially interested in the proceeding, nor do I
20 have any other relationship that may reasonably
21 cause my impartiality to be questioned.

22 IN WITNESS WHEREOF, I have set my hand in my
23 office in the County of Clark, State of Nevada,
24 this April 1, 2025.

25


Heidi K. Konsten, RPR, CCR No. 845

1 DECLARATION OF DEPONENT

2 I, ADRIAN BEAS, deponent herein, do
3 hereby declare under penalty of perjury that I have
4 read the within and foregoing transcription of my
5 testimony taken on March 28, 2025, at Las Vegas,
6 Nevada, and that the same is a true record of the
7 testimony given by me at the time and place
8 hereinabove set forth, with the following
9 exceptions:

10

11 ERRATA SHEET

12	PAGE	LINE	SHOULD READ:	REASON FOR CHANGE:
----	------	------	--------------	--------------------

13

14

15

16

17

18

19

20

21

22

23

24

25

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

Page 173

1

ERRATA SHEET

2

PAGE

LINE

SHOULD READ:

REASON FOR CHANGE:

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

Date:

ADRIAN BEAS

24

25

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

1	15- 147:12	49:12 89:17	155:5	108:13 120:5	7
1 11:23,24	17 60:6	20-second 147:12	23 21:2,19, 20 22:6 155:19	360 52:12	750 54:25
1/2024 155:9	175 68:22 96:11	2000 20:8	24 10:22 155:5,7	4	8
10 15:7 35:3 53:16 101:17 110:5	179.055 42:13	2003 18:9	24-hour 142:19	4 20:8 168:21, 22,25	809 114:11
100 35:7	18 59:10	2007 20:10	25 64:22 66:20 68:3,20 70:1,25 71:7,12, 13,14 80:18 81:3,9 91:16 93:1,24 96:11,23 97:1 111:14 112:25 120:6	40 153:9	810 114:11
10:36 75:18	180 69:2	2008 20:12	27 124:17	43 69:1	8th 18:2
10:46 75:21	19-year-old 112:7	2012 20:14	27th 18:15	4443 169:2	9
10:th 6:1 51:3 80:23	1994 18:25	2014 20:18	3 103:22 114:4,5,7	48 11:1	9-bang 66:22 68:25
1120 106:22	1998 18:16,18, 24 19:20 20:4	2017 20:19	30(b)(6) 11:10 170:20	5 68:24 93:2,4 95:13 96:15 97:1,7,16	9:00 167:19
1125 106:23,24 107:5	1998 18:16,18, 24 19:20 20:4	2019 20:22,23	3 103:22 114:4,5,7	5 68:24 93:2,4 95:13 96:15 97:1,7,16	9:15 14:8
12-gram 68:21	1:53 170:23,24	2021 13:9 98:14,15 124:17 155:1	3 103:22 114:4,5,7	5 68:24 93:2,4 95:13 96:15 97:1,7,16	9:17 14:11
120 153:10	1st 20:12	2022 6:1 15:7 35:3 51:4 53:16 80:23 88:23 101:17 110:5 155:4	3 103:22 114:4,5,7	5 68:24 93:2,4 95:13 96:15 97:1,7,16	A
12:00 133:8	2 98:2,4,6 99:22 103:21 152:9	2023 18:2 155:4	3 103:22 114:4,5,7	5 68:24 93:2,4 95:13 96:15 97:1,7,16	A-D-R-I-A-N 5:16
12:59 133:11	2 98:2,4,6 99:22 103:21 152:9	2023 18:2 155:4	3 103:22 114:4,5,7	5 68:24 93:2,4 95:13 96:15 97:1,7,16	a.m. 14:8,11 75:18,21 166:2 167:3
1491 98:8	20 20:24 73:4 75:7 146:25 147:13	2023 18:2 155:4	30(b)(6) 11:10 170:20	5 68:24 93:2,4 95:13 96:15 97:1,7,16	abide 127:10 138:14 156:7
15 25:6 73:4 75:7 146:25 147:13,20	20,000 98:21	21 99:9 155:2	3000-square-foot 140:14	5 68:24 93:2,4 95:13 96:15 97:1,7,16	ability 11:6
	20-plus 47:12	22 20:25 21:18	3050	5 68:24 93:2,4 95:13 96:15 97:1,7,16	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

28:9,10	130:18	acquainta	69:10	admissibl	42:1
41:17	131:3	nce	84:2,23	e	62:16
157:25	133:14	16:13,14	92:4 94:2	10:4	63:1
158:24	138:12	across	95:18	admit	affects
159:10	139:5	67:3	96:2	148:16	62:6
163:12	142:12	action	99:11	admittanc	affiant
164:24	149:4	15:6	101:4	e	72:24
able	155:15	27:23	102:20	43:1,3,8	134:12
63:21	156:21	46:5,7	103:13	44:3,4,5,	135:23
92:8	169:4	48:7	121:16	8,9,17	afford
99:13	above	49:22	122:9	118:19	9:1
156:25	17:12	50:25	126:4	125:11	afforded
163:10,19	academy	51:2,21	129:4	admittedl	83:20
about	19:21	58:6	140:9	y	144:1
11:15	20:5 73:9	61:13	149:5,16,	120:18	163:2
14:25	accepted	133:23	17	admonitio	after
17:2 18:4	146:17	actions	150:14,21	ns	7:7 18:25
23:4 24:3	accepts	30:2 58:8	151:24	6:12	19:5,20,
26:8	142:4	active	158:8,10	adopt	21 42:24
29:8,20	accident	166:18	164:6	29:10	46:9,14
32:25	27:15	activitie	Adam	adopted	49:13,25
36:3	according	s	5:21	97:19	50:6 52:9
37:18	39:1	78:22	add	Adrian	67:5,11,
38:16	account	actual	154:23	5:16	12,25
41:5 45:6	82:2	44:4	156:9	170:20	69:18
48:13	accounted	50:24	added	adult	70:25
52:7,8	124:2	71:4	132:25	18:21,22	71:3,7,
56:5	accuratel	95:23	133:2	112:4	12,13,14
58:20	y	101:12,22	156:2	adults	75:3
60:22	9:3	102:4,12,	Additional	110:11	80:8,12
68:22	accused	22 104:24	lly	149:7	81:9
69:2	125:8	105:9,13	address	advance	82:24
72:21	127:9	106:2,13	53:22	7:13	106:1
73:3,19,	acknowled	126:15	105:10	advanceme	111:6,7
23 74:3	ge	138:20	106:2,13,	nt	121:13
75:5,7,14	85:6	143:9	14 107:4	20:1	123:18,21
76:20	88:12	144:25	adequate	advantage	126:7,15,
78:10	143:6,25	146:12	29:18	61:17	17,20
86:17	acknowled	147:10	86:23	108:25	134:1,18
88:5 89:9	ges	actually	adjust	162:11,	135:9
91:6 93:4	104:8	7:9	63:11	19,23	137:15
94:7		33:12,20	administe	affect	147:18,20
100:7,8		39:5	red	11:5 41:8	again
101:8,15		43:2,25			16:17
109:4		48:21			24:13
112:12,18		57:2			34:13
113:20					
115:5,15					
119:23					

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

39:8	127:2	63:6	59:18	118:13	21:14
45:13	128:11,	72:5,8	62:19	132:19,20	28:11
49:12	15,20	77:20	65:17	138:17	34:20
52:4	133:20	80:22	79:8 85:8	139:7	41:15
54:13	136:13	83:19	97:5	142:11	42:17
56:7	140:3,11	84:20	107:19	145:20	51:7
57:24	141:17	86:4	127:15	152:13	63:16,25
58:5,8,	143:7,19	91:20	129:16	161:12	73:9 75:6
15,25	144:24	92:1,9,12	158:3	165:22	78:4
59:2,6,9	145:5,12	93:17,23	alcohol	167:20	85:16
60:16	146:9,11	96:5	161:6,7	170:6	89:20
61:1,7,	148:20,21	99:21	alcoholic	alleged	90:14
12,15	153:3	100:10,	10:21	128:12	92:19
65:18	155:7,18	24,25	alert	allow	93:3
67:5 69:7	157:19,21	106:5	61:7	40:3	109:25
70:10,19	159:12	108:11	167:15	46:11	110:9
71:11,23	162:11	111:19	Alex	66:7,9	132:1
73:3,18,	163:25	114:14	14:25	67:2 68:7	142:24
22 74:8,	164:19	115:1,12	24:7,9,17	86:7 91:7	147:1
16 76:10,	165:2,20	116:9,18	Alexander	157:6	166:10
24 78:4,	167:5,16	135:4	5:22	allowed	167:11
16 79:9	against	136:23	all	88:23	alternate
81:23	5:23 22:2	144:18	6:15 7:5,	126:14	161:25
82:19	92:21	147:12	8,25	134:3	always
84:10	97:16	148:1,3	8:13,25	156:18	18:22
86:16	107:16	149:11	15:3,11	alluded	57:8,24
87:16,18	111:20	161:5	17:4	143:20	105:10
88:5	Agate	164:5	22:18	153:7	139:16,17
93:23	124:18	166:21,24	26:10	almost	Alzheimer
94:16	age	168:18	28:11,12,	77:1 81:4	's
95:13	112:12	agreed	13 29:3,4	124:15	11:5
96:8,10	aggravati	46:24	30:5	alone	ambiguous
97:6,8	ng	51:10,18	37:18	150:23	117:5
99:5,7,9	131:15,17	55:16,17,	38:4	along	Amendment
101:15	ago	19 84:16	52:13	22:7	33:22
102:9	24:17	86:22	53:14,21	107:1	42:6
104:25	73:11	110:14	55:4	142:11	48:13
105:25	agree	agreement	58:14	already	49:4
107:20,22	29:9,21,	49:9	61:3,19	13:23	89:25
108:22	24 30:4,5	agrees	63:18	19:11	90:15
109:7,13	35:11,21	84:15	71:20,24,	113:20	93:13
112:22	36:12	ahead	25 72:17	also	Amendment
113:7	38:22	5:14 31:2	73:12	13:7	's
114:19	39:14,17,	32:13	76:11	16:16	43:9
116:20	18,23	35:16	78:12	19:8	amount
117:1,4,	42:3,5	40:17	82:2 99:7		33:13
16 119:11	60:12,15	43:13	109:13		
121:7		49:7			
124:22					
126:8					

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

39:25	43:12	ankle	announced	67:6,8,12	109:2
40:5 41:5	47:10	150:11	46:10	68:10,11	124:16
44:24	48:12	announce	78:21	73:19,23	127:8
46:9	49:6	33:10	105:11	74:5,18,	140:3,21
57:9,25	51:17	35:13,19	announcem	19 75:3	144:9
58:3,12	57:7	38:13	ent	76:4,13	answer
76:7	58:24	39:1,5,	33:10	77:10,18	9:6 31:2,
79:2,5	59:16	10,15,19,	52:22	78:14	4 35:16
80:11	60:9,13	24 40:7,	67:24	79:25	40:17
82:21	62:17	10,15	68:1,5	80:17	43:13
83:6 85:4	64:7	41:7	69:19	82:14	49:7
86:7	65:16	42:6,18	77:22	83:2,5	59:18
88:14,16	75:16	43:9,20	80:9,13	85:14	65:17
92:24	76:23	46:8,12	82:24	86:15,22	72:4
100:22	79:7	47:5,9	84:18	102:3,23	101:7
118:17,21	80:14	49:5,10	102:5	103:6	122:2
120:10,14	81:7	50:12,19	105:9,22,	104:2,19	126:5
121:9,13	83:17	53:7,12	23 106:4,	105:3,19	128:20
125:10,15	85:7 86:9	66:4,6,25	6,7,16,	106:15	129:16
127:24	87:5	72:14,19	20,25	119:12,18	143:14
136:24	90:16	73:7,20,	107:1,6,	120:16	156:25
142:15	93:20	25 76:5	8,10,14,	121:14	157:10
144:2,20	94:15	85:5 86:8	15 108:3,	122:11	158:4
145:10,25	95:5	87:23	7 113:24	128:8	159:5
146:1,6,	96:17	88:24	118:16,	130:11	answers
8,20,23	97:4,21	89:14,21	22,23,25	136:25	7:6,8
154:4	98:14	98:24	119:3,6,	137:3	Anthony
156:18	99:24	99:4,23	7,8	142:1	48:3
AMPM	106:9	100:12	120:2,3,	145:4	Anthony's
54:16,19	107:17	101:21	8,12,13,	146:15,	85:11
55:10	110:21,25	102:4,16,	18,20,24	17,18	any
166:9	114:18	19,22	121:4,17,	151:22	7:6 8:1
and/or	117:15	103:7	20,24	163:13	10:21,24
48:1	127:14	104:4,20	122:5,8,	165:4,5,	11:3
140:8	128:4,14	105:1,7	17,19,22	17,22	13:22
Anderson	129:15,	107:22	126:7,11,	announces	14:16,17
9:13,22	18,21	115:15	13,18	163:25	15:16
10:11,15	147:5,16	118:15	129:3	announcin	23:16
12:18,20	148:6	125:9	137:13,	g	26:7,11,
13:14	151:13	127:10	16,18	34:13	13,16
14:3	152:10	132:25	announcem	40:19	28:18
15:25	158:2	133:15,18	ents	45:17	32:18
16:19	161:19	138:9,19	40:11	103:6	37:2
31:1	165:1,11,	143:21	44:12,24	annually	42:22,23
32:12	19 170:7,	153:2,20	49:23	154:16	44:20
35:15,24	8,10,12,	154:5	52:18	another	47:24
36:16	16	156:5,6,9	58:11,14	34:5	52:14
40:16	angles	162:25	66:13	52:4,15	
	13:16,18	163:11			

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

63:3,7	anyone	apartment	approved	78:6 83:9	15,18,22,
71:21	8:25	s	38:5	123:2	25 21:1,
74:7,8,25	144:15	55:7	45:16	131:5,18	3,22
76:2 78:3	anything	apologize	54:10	145:2	22:9,10,
79:4	12:13	55:18	55:13,20	arming	13,16
81:21	33:16	apparentl	110:1	67:18	24:24
85:22	37:11	y	112:25	armored	25:13
91:11,13	42:23	19:7	130:16	54:15	26:5,13,
92:2	44:18	123:9	134:4,5,	83:21,23	18,22
94:24	47:22	Appeals	10 136:3,	around	28:2,4
100:21	75:8	34:1	10,12	17:18	29:8,16,
102:22	78:3,22	146:21	approves	36:23	25 30:10,
104:11,21	98:25	appears	152:4	37:16	13,22
109:6	136:6	162:2	approxima	41:3 55:1	31:19
112:24	143:21	applicabl	tely	68:21	32:9,10
115:19	144:16,23	e	115:25	78:17	36:13,18,
116:20,21	170:7	100:19	116:14	93:4	19 37:1
118:10	apartment	applicati	area	130:24	42:3 43:9
121:10	13:4	on	19:23	161:18	46:25
123:13,16	41:14	136:14	20:7,13	167:10	47:1,2,7,
125:17	51:3	applies	41:13,15	arrest	18 48:21,
128:24	54:14,23,	142:13	52:20	22:19	23 49:4,
131:7	24 67:3,	apply	55:9	132:12,	10,11
138:6	22 81:2	82:10	90:5,8,	14,15	50:10
142:10,	82:12,15,	142:5	13,18	139:21	53:17
18,19	18 83:4	applying	100:10	arrested	56:4
143:22	84:19	33:24	areas	27:16,21	58:16
145:7,8	91:23	approach	55:10	123:10	61:4
146:18,20	105:8,9,	162:18	argue	168:6,13	66:17
147:3	12,15,16,	166:12	83:12	arresting	69:20
148:17	22,24	167:13	argumenta	27:16	72:10
150:22	106:6,12,	169:11	tive	articulat	76:2
152:18,	14,18,21	appropria	122:3	e	80:12
23,25	107:14,	te	Arkansas	137:15	81:5
154:20	21,25	117:23	33:5,25	as	82:13
156:4,10,	108:7,9,	approval	34:18	5:15 6:18	83:2
21,23	12,14,15,	109:18	37:8 73:3	7:16 8:6,	84:4,13
157:2,5,	17 120:6	133:4	98:25	8,23	85:20
11,16	134:8	148:25	101:1,4	11:17,22	97:20
159:23	140:18	153:13	arm	13:4,10,	98:8
166:5	144:16	approve	145:6	11,12	99:22
168:17	147:24	136:14,16	armed	15:22	100:22
169:7,17,	148:5		41:16	17:8	101:20
21	149:18		45:3 55:2	18:20,22	102:5,13
anybody	150:17,22			19:11,13,	103:13
44:25	164:6,7			23 20:13,	104:22
92:10	166:8				105:3,7
94:22	167:24				106:13,14
97:11					107:20
					108:20

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

110:3,22	91:6	associati	94:22	167:3,4,8	102:6,14
111:1	110:24	on	96:3	168:4,5	105:4
113:22	111:1	27:5	101:18	169:10,	107:23
114:4,11	134:13	47:15	103:21	11,15	119:9
117:2	148:13	assumes	105:5,24,	170:13,24	122:12
121:16	asked	163:15	25 108:8,	ATL	165:6
122:24	49:23	at	18 111:9	53:24	authorize
123:6	166:14	8:12,24	112:23	54:1	d
126:22	asking	9:4 10:1,	113:4,15,	56:8,11	52:6
127:19	38:16	3 12:20	18,21	59:4 71:2	73:13,15
128:21	78:10	15:7,11	115:17,21	80:1	109:5
130:5,25	asleep	17:11	116:6	111:9	authorizi
134:10	82:13	18:1,6	117:6	112:23	ng
136:9,15,	118:12	19:13,22	118:6,16,	145:14	72:23,24
18,21	142:15	20:7	24 119:5	152:4	available
138:24	143:1	21:22	120:11,15	ATLS	54:3
141:8,24	165:18,21	23:10	121:13,23	86:20	56:14
142:4	166:5,18	24:12,23	122:7,21,	146:14	Avenue
146:23	167:15	25:21	23 123:21	attempt	124:18
147:7	assault	26:10	124:3,11,	102:1,8,	avoid
148:8	124:25	27:1,12	17 125:13	18 103:24	8:24
151:25	assess	32:4,6,9,	126:10	attention	avoided
152:12	166:22	10 35:21	130:1,3,	61:8	60:8
154:21	assigned	44:14,16	7,16	65:20	awake
155:9,11	17:8	47:20	131:7	66:18,23	116:17
157:2,5,	124:23	48:2	132:4	67:4,18	117:25
24 159:15	assignmen	49:24	134:6,8	158:8,16	118:5,12
160:6	t	56:6,19,	135:13	attorney	165:23
163:8	19:19	23 59:10	137:7	5:22 9:13	aware
164:3,17	assist	60:17	139:15	38:6	12:10
166:11	162:20	62:11,12,	141:1,5,	audible	57:1
167:2,15	assistant	15 63:4,	6,10,20	8:5 64:1,	64:17,18
168:10,21	29:4	7,10	143:11	23 69:2	74:25
170:20	103:15	67:5,10	145:14	auditory	91:25
ascertain	109:14	70:20	146:6,7,8	61:14	99:2,12,
40:2 66:8	129:5	72:5	148:9	authoring	17 136:20
111:17	associate	74:23	150:6,17,	135:24	146:20
133:2	's	75:2,8	22 151:11	authority	147:7
149:5	18:6	76:11	153:11	33:14	152:12
163:3	associate	78:23	154:24	34:14	166:13
aside	d	80:3	156:16,	38:13	168:8,9
116:17	13:5	81:12,15	17,19	39:10	away
ask	35:18	82:12,24	158:17	42:25	49:16
7:25 8:1,	55:8 73:6	85:1	159:2,15,	76:14	61:14
10,16		86:2,19	17,19,23	77:7	66:18,23
9:22 10:9		87:20,22	161:12		
12:14		88:7	163:4		
14:2 33:2		89:19,23	165:8,13,		
		91:3 92:3	14		
			166:11,14		

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

68:24	backlit	65:3	76:16,18	basing	98:11
94:24	162:15	Banks	77:2,13	70:10,22	102:11
109:3	Backman	34:6,15,	78:12,13,	basis	106:11
110:12	13:2,17	24 35:6	14 79:9	47:16	112:11
112:4	14:24	37:12	80:2	50:23	116:20
133:1	24:15,16,	73:6	83:6,7,22	140:16	117:5
138:20	19 25:3	100:20	85:10	Bates	118:8
139:23	54:7,9	143:10,16	86:12,15	99:13,18	122:6
158:8,16	55:21	144:10	87:9	169:2	123:9,21
	104:6	146:24	88:15,20	battering	124:7,10
B	105:19	147:11	92:15	81:5,10	126:24
	107:21,24	banned	95:7 97:7	Bearcat	128:21
B-E-A-S	109:25	131:7	102:24	83:13,22,	132:21
5:16	110:2	bare	103:4	23 84:13	135:21
back	111:10	117:11	104:17,25	Bearcats	136:3
10:1	120:4	barricade	108:23	54:15	139:1
12:22	121:1	145:7	109:7,14	Beas	140:14,18
13:9	151:10	barricade	110:16	5:16	149:16
14:13,19	152:7	s	111:8,15,	14:13	151:25
20:15	ballistic	61:3	22 112:3	72:9	152:7,22
25:13	84:3,5,10	base	115:8	133:13	155:18
38:3	Bandiero	71:6	117:10	170:20	162:15
40:18	48:4	73:25	118:3	became	163:9
56:8 58:2	bang	74:13	119:14	20:2,6,8,	165:23
75:10	64:22	76:12	128:19	22 27:13	166:4
76:11	65:7	79:22	130:8	become	79:17
78:4 80:7	68:25	82:2	134:17	20:2,6,8,	becoming
97:9	70:14	102:11	137:6,19	22 27:13	45:3
112:22	71:2,5,8,	115:8	138:20	because	bed
119:16	13,15	117:16	139:20	8:11,17	143:4
121:7,19	77:10	119:11	140:11	9:16 10:5	before
126:8	109:2	based	145:12	31:5 34:8	6:8 9:6,8
133:13	159:19	10:3	146:11,13	36:1,3	26:23
136:13	banger	28:16	150:2,6	38:12	33:15,16
141:17	64:15,16,	40:13	152:18	44:24	40:7,11
144:24	24 65:2	45:14	161:4	47:4	69:5
145:23	67:3	46:16	165:20	57:15	71:8,13,
147:24	68:15	48:3,5,25	167:5	58:1	16,20
148:21	69:11,21,	52:7 55:4	168:12	59:23	72:6 75:2
157:21	23,25	56:10,18	169:24	63:10	80:5,13
160:20	70:8,17	58:6	bases	65:6	82:3
backgroun	71:1,19	69:24	76:18	70:11,21	98:10
d	72:6	70:11,19,	basic	71:12	114:2,12
17:2 18:4	banging	23 71:22	151:11	74:8,12	116:3,10
151:17	78:2	74:10,14	152:8,24	76:25	119:6
backing	bangs	75:11	153:1	82:5,7	120:24
77:7			basically	83:8 87:9	121:3,12
			169:5	91:10	
				95:13	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

125:14	20:8,14	135:6	127:17	90:1 92:4	Boulevard
137:4	21:18,19	139:18	Bertuccin	93:13	55:10
139:23	23:11	140:24	i's	blinded	120:6
144:16	26:16	141:8	69:25	127:4	166:9
150:17	31:3,22	147:19	best	blindly	Boyd
beforehand	35:1	150:7	54:4	91:8,10	93:6,9
59:8	43:6,8,10	151:14,16	better	94:9,12,	breach
begin	44:23	153:8,25	47:21,24	16	66:23
9:8 11:18	53:10	154:9	56:11,17	blinds	67:7,14
67:13	54:7,24	155:5	167:13	113:14,15	81:10
82:17	56:16	159:24	between	bluntly	82:4
118:22	57:11	164:9,23	19:12	128:11	109:4
beginning	58:15	167:25	43:19	board	119:20
118:22	59:13	believed	68:5 74:4	51:7,15	122:14
119:5,7	64:13,20	54:4	76:4	84:16	125:1,2
120:12	65:4	55:2,5	77:21	85:24	128:6
121:24	67:25	56:11,19	79:1	86:11	129:3
122:17	69:1	88:8	84:18	87:12,13,	130:2,9,
behalf	70:4,15,	94:21	113:24	17,18	13 139:2,
6:4 11:20	24 71:10,	97:10,11,	126:12	88:4,17	25 140:7,
75:24	11,15,19	14 103:5	136:24	bodies	15,22,25
77:20	73:17	111:10,13	142:1	139:4	141:6,14
behind	74:22	112:23	beverages	140:10	156:2
40:14,24	76:25	113:15	10:22	165:3	158:17
45:25	81:8	123:25	beyond	body	breached
83:13,21	82:19,25	124:2,11	95:13	132:16	164:6
92:1,9	84:5,8	143:13	binds	body-worn	breaching
94:20	85:10,18,	149:2,21	11:16	13:14,16,	80:19
96:21	22 87:9	believes	bit	19 71:4	83:1
97:9	90:21	107:10	17:2 18:3	Bolden	132:23,
113:14	91:6,7	believing	23:3	20:13	24,25
125:4	95:10,12	149:23,24	36:24	booklet	137:4
130:14	96:18	167:15	37:17	7:9	141:2
133:3	99:9	Benton	38:3	both	break
145:21	100:15	93:6,9	black	40:25	42:22
149:2	101:8	Bertuccin	162:5	54:3,6	48:15
belief	105:2,23	i	blackout	82:11	67:21
41:18	106:11,21	13:2,17	162:4,8	85:3	75:15
87:20,21	107:3,7	14:23	163:7	111:1	80:7
97:9	108:4,6	25:17	blank	113:7	121:18
123:24	110:2,6	64:14,21	123:3	124:12	breaking
believe	111:24	68:1	blind	bottom	80:25
9:5 13:23	115:18	69:15,17	63:21	115:21	147:19
17:18	126:20	91:24	89:24	116:6	Breeden
18:9	127:3,6	94:18			5:11,21
	129:1	97:10			12:1
	130:15,	113:16			
	19,20,21				
	131:2				

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

13:20	158:11	brightnes	43:15,24	8,24	19:8,18
14:5,12	161:24	s	45:2 47:4	116:15	28:6
16:1,20	165:7,15	63:13	48:23	117:1,4	31:10
31:10	166:1	bring	49:24	118:1	32:1,15
32:15	168:24	54:14	50:23	122:5,17	35:20
35:20	170:5,15	broadly	53:6,20,	123:10	36:8,22
36:8,22	Breonna	148:13	21 54:16	124:4,23	38:5,6
40:22	134:20	broke	55:25	126:25	40:10,22
43:17	135:6	108:10	56:20,23	127:6	42:6,8
48:9,15,	Brett	broken	57:9	128:19	43:17
17 50:4	28:6	147:25	59:25	130:20	45:22
51:23	Brice	Brosnahan	60:16,19	132:1,10,	46:23
57:10	23:13,20	28:6,21	61:21,25	11 133:17	48:3,9,17
59:12	brief	brought	62:12	134:15	49:4 50:4
60:2,11,	70:13	128:19	63:6,9	135:5,6	51:7,23
21 62:21	73:22	135:7	64:12	136:17	55:6,13,
64:10	briefed	building	65:13,24	137:9	20,21
65:23	55:21	54:14,18	66:14	138:15	57:10
72:12	59:3,5	123:19	67:10	140:11,17	59:12
75:13,22	69:23	built	69:23	141:2,5	60:2,6,
77:15	71:6	65:3	70:3,15	147:9,22	11,21
79:18	103:1	bureau	71:3,11	148:12	62:21
80:21	122:10	135:24	73:5 77:9	149:22	63:23
81:11	126:10	burn	79:15,20,	150:8,21	64:10
84:1	146:1	92:17	21 81:15	151:16	65:23
85:15	briefing	95:23	82:10	152:17,22	71:1
86:24	59:7	burst	83:13,19,	153:7,9	72:12,15
87:11	70:20,21	44:19	22 84:2	156:9,24	73:1 74:9
90:19	73:23	but	85:2,12,	157:21	75:22
94:6	144:25	8:23 10:8	16 86:2,	158:20	77:15
95:1,9	briefings	12:7	16 87:7,	159:17	79:18
96:24	145:16	13:18	18 89:5,	160:17	80:21
97:13,25	briefly	18:21	12 90:12	162:18	81:11
98:5,16	14:6	19:25	92:1,7,9,	163:22	83:24
100:2	170:10	21:25	17 93:8,	164:11,19	84:1,6,16
106:17	briefs	22:10,18,	23 94:11	165:8	85:15
108:1	109:16	21 24:4,	96:9	166:10	86:10,24
110:24	152:5	20 25:16	99:17	168:3	87:11
111:1,2	bright	28:10	100:6	169:19	88:1
114:6,24	61:22	31:23	101:7,11	buy	89:14
117:21	62:1,12	33:2 35:7	102:3,5,	29:10,11	90:19
127:18	63:5	36:6	16 103:4	by	93:14
128:9,23	162:2	37:1,6,9	104:8,17	5:11 6:16	94:6
129:20,23	163:8	38:14	106:1,3,	10:10	95:1,9
130:4			13,20	12:1	96:24
133:5,12			107:3,25	13:20	97:7,13
147:6,21			109:18	14:12	98:5,16
148:11			112:14	15:22	99:22
151:19			113:5,21	16:1,5,20	100:2
152:14			115:1,7,		106:17

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

108:1	49:18	16,17	124:5	ceiling	78:15
111:2	52:1,12,	134:5	125:7	94:23	80:16
113:1	16 53:11,	career	127:12,22	95:14,19,	82:23
114:6,24	15,18	20:16	128:22	22,25	88:23
117:21	54:17	carry	133:20	96:9	89:13
120:19	55:6,12,	124:13	134:19,	113:4	108:24
121:3	17 68:14,	carrying	21,24	ceilings	119:17
127:10,18	15 71:1	164:10	135:2	95:16	124:24
128:9,23	83:14	case	138:23	cements	130:18,25
130:4	162:4,8,	6:5	140:12,23	33:9	131:4,7,9
132:6	10	12:23,25	143:10,19	Center	133:18,
133:12	called	13:8,24	144:10,	132:3	22,25
134:5	20:16,17	14:16	12,14	certain	134:3
135:15	28:5 34:5	32:22	146:16,25	37:7	137:5
136:4	102:15	33:4,8,9,	147:1,3,	41:4,7	138:4,9,
138:14	130:11	12,20	10 154:25	56:2	11,16
147:6,21	calling	34:3,5,7,	158:23	60:17	139:9
148:11	60:24	9,11,16	162:7	138:13	141:1,20
150:15	callouts	35:9,23	case-by-	certainly	148:22
151:19	22:9 61:3	36:4 37:4	case	58:22	153:20
152:14	calls	38:12,23	140:16	certifica	154:1
155:21	12:22	48:2 49:1	cases	tion	155:15,25
156:7	came	64:12	32:19	30:22	162:20
158:11	17:18	65:14	33:1	CETS	
159:22	50:21	73:5,6,9,	36:14	138:8	
161:24	116:19	18,22	37:7	change	
165:7,15	136:15	74:9,16	46:21	7:15 48:5	
166:1,25	154:9	75:5,6	73:4,7,18	45:7,8,	
168:11,24	164:18	76:11	79:23	16,25	
bystander	camera	79:22	100:20,23	46:6,12,	
93:18	13:14,16,	80:6	116:1,15,	15 47:8,	
125:20	19	82:8,11	22 117:3	11 48:10,	
bystander	cameras	93:6	147:1	19,23	
s	71:4	96:14	157:18	49:4,9,	
93:14	canister	100:21	category	17,19	
112:16	69:6	101:4,5,	112:8	50:10,11	
C	canisters	6,12	cause	51:5	
C-I-N-T-	69:4	102:22	61:5	52:3,6	
R-O-N	cannot	103:4,19	91:13	53:24	
17:15	59:21	107:24	139:21	54:4,12	
call	60:17	108:24	158:7,10	55:17,19,	
6:12	93:12	109:20	caused	24,25	
16:12	captain	111:7	63:23	56:3,11,	
37:21	17:12,14,	112:16	161:11,16	15,18	
48:22		115:13	CCDC	57:12,15,	
		116:20	132:3	19 58:5,	
		118:1		20 59:14	
		119:16		66:19	
				74:18	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

3,6,9,13	14:25	cite	53:5	49:9 53:4	86:21
changes	69:12	37:7	90:5,8	54:1 58:2	90:23
7:11	71:5	101:1	110:8	59:22	103:17
130:17	Cintron	102:3	113:11,14	61:21	109:17
132:17,20	17:15,16	146:24	147:22	66:7 67:1	127:21
135:9	Circuit	cited	148:8	68:7,10,	136:10
138:6	33:25	34:19	161:23	12 76:15	comment
146:5	93:5,10	110:17	cleared	87:7	7:18
154:20	141:23	cites	113:10	118:18	comments
155:17	146:21,24	146:25	clearing	125:10	7:6
156:4	147:3	citing	90:13,17	136:18	Commissio
changing	circumsta	102:9	91:12	141:15	n
28:25	nces	citizens	97:9	143:4,18,	114:8
49:15	77:3,12	41:3,17	clearly	23 146:14	committed
132:23	79:4 82:7	47:25	27:8	155:20	123:8
charge	115:24	52:11	44:25	comes	committee
69:14,18	CIRT	57:23	149:2	53:25	29:9
70:8	12:24	58:9	Clements	69:8	common
90:23	47:1 48:3	78:17	23:13	114:21	8:14
91:21	49:25	140:6	clips	comfortab	33:12
95:11	50:21	166:10	170:22	le	40:18
114:15	51:6,15,	167:10	close	141:21	102:20
115:2	19 74:22	citizens'	92:13,22,	169:16	135:15,17
125:14	84:15	82:1	25 95:25	coming	community
126:9,13	85:2,9	civil	closed	28:15	167:6
129:11	86:6,10	11:10	92:4,6	102:20	complaint
130:13,15	87:4,7,17	128:3,12	113:14	command	128:12
153:14	88:4,17	clarify	closeness	17:11	complaint
child	110:20	15:20	55:7	19:23	s
125:25	111:5,15	110:22	166:8	20:8,13	22:2
children	128:16	148:12	closer	71:5	complete
110:11	144:3	Clark	95:15	commander	36:18
111:12	148:20,21	18:10	136:25	17:9,13,	120:13
112:4,7,	151:1,6,9	132:3	closest	22,23	completed
10,12	153:12,19	class	95:21	18:1	7:7 119:6
125:24	154:3	72:22	College	20:23	151:11
149:7	159:24	73:16,17,	18:7	21:3,4,12	152:8,22
choose	160:21,	20 101:10	19:10	22:5,9	completel
66:16	23,24	classes	come	28:2	y
chose	169:1,3,	28:19	11:19	29:2,3,	9:6,8
67:11	24	72:22	15:24	13,17	131:7
87:14	CIRT's	clear	16:17	33:3 36:5	168:6
chosen	51:10	10:13	40:1	50:3	
166:3	110:7,13	11:17	46:10	54:10	
Chris	111:22			55:13	
				56:6 59:5	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

complex 41:15 54:23 108:12,15 150:20 166:8	concept 45:25 57:4	50:18 85:12	160:1	consultan ts 85:21	contribut ed 161:12, 13,16
complexes 140:19	concernin g 72:18	confronta tional 57:6,16	consistin g 170:22	consulted 134:2	control 91:11,15 93:25 94:4 112:21
compliance e 47:8	concluded 154:3 170:24	confuse 61:10 64:6 158:13,19	constitut e 96:23	consumed 10:21	
compliant 57:12,20	concludes 170:19	confused 64:14	constitut es 115:11 157:12	consumpti on 161:11	controlle d 45:8 55:19
complied 49:10 50:11 87:23 89:21,24 107:11	conclusio n 50:21 67:23 85:16 88:1,2 110:15 153:22	confusion 158:20	constitut ion 30:7,10 42:7,9 74:1 91:7 110:23 138:1 157:22	contain 41:18 52:10,12, 13,17 55:5,11 140:5	conversat ion 14:17
complies 58:15	conclusio ns 51:16 169:8	connected 27:12	constitut ional 29:24 32:17 33:21 73:10 90:14 93:15 96:16,19 111:25 112:2 117:12 121:8 146:23	contained 52:19 72:19 140:15	conversat ions 14:20
comply 30:6,9, 12,25 35:14 40:7,9 85:4 86:7 117:12 137:22,25	condition 11:4	consider 30:19 40:23 41:8 46:11 57:19 79:3	containme nt 45:17	copy 170:10, 12,13	corner 54:13
composed 29:3	condomini ums 140:19	considere d 99:1 115:23 116:1 123:13 124:6 146:5 168:4	contempor aneously 70:17	Corps 18:25 19:1,4,5, 12	
compromis e 162:16	conducted 30:3 88:8 149:19,20	considers 92:25 145:9 146:6 166:22	continue 10:17	correct 23:5 25:24 30:7,8, 11,14 33:19 35:19 36:10,11 37:13 38:2,20, 21,24 39:3 40:8 42:11 46:3 47:9 48:11 50:8,9, 13,14,16,	
compromis ed 149:23	conductin g 154:4		constitut ionally 113:4	continuou sly 18:17	
concealme nt 83:21	conferenc e 166:14,20		construct ion 44:19	contradic ted 133:24 148:23	
concede 78:20 96:13,25 107:15	conflict 46:12,15, 25 53:11	consisten t 128:7	consultan t 49:20 50:15 133:21 154:10	contradic tory 57:15	
	conflicte d 49:5,22			contrary 153:20	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

22 51:4, 5,8,9,11, 12 55:1 56:25 57:3,6,9 61:22,24 62:1,2 65:15 67:24 71:9 80:9,10, 13 81:6 85:17,21 87:15 88:25 89:1,16 97:17 103:11 105:17 110:1,15 116:3,12 118:2 121:21 122:14 125:17 127:20 129:14 138:1,2 139:10,11 142:5,6, 23 147:15 148:2 150:13,24 151:4,23 152:2,6 153:9 154:1 160:4,5, 16 164:15,22 167:24 169:9 correctin g 7:16 couch 95:7	counterte rrorism 20:24 counting 120:10 121:12 County 18:10 93:6,9 132:3 couple 13:18 20:19 61:5 73:11 89:4 96:4 129:19 course 151:11 152:8 court 5:14 6:16,17 7:3 8:19 9:3 26:23 27:22 32:19 33:4,25 35:14 40:13 128:19 134:13 146:21 courtesy 9:1 courtroom 9:18 cover 32:22 83:20 167:12 coverage 84:12,14 covers 93:16	99:7 114:20 Craig 12:18,20 create 61:22,25 created 29:2 crime 45:14 52:9 55:8 83:10 123:1,5, 8,10 125:17 134:16 168:7 criminal 18:7 19:9 20:16 27:5 132:10 criteria 45:13 52:7 critical 36:20 50:20 criticism 135:3 criticize d 135:5 CT 139:9 CTS 66:22 68:25 current 13:11 17:4,6,14 28:14 90:22	currently 5:17 17:8 48:21 curtain 145:21 custody 139:20,22 cut 79:20 cutout 100:16 cycle 65:2 <hr/> D <hr/> daily 47:16 damage 127:6 dangerous 93:11 104:13 149:22 dark 62:23,24 63:2,4 darkness 63:13 167:12 date 99:8 dated 13:9 98:12 day 28:3 41:23 42:1 53:25 110:3 122:18 141:24	142:10,14 143:8 144:4 152:13 166:22 167:7,9, 16 170:17 days 23:12 24:13,14 daytime 62:25 de- escalatio n 57:2,4, 12,20,24 58:16 deaf 63:20 163:18 deal 22:21 48:1 dealing 155:25 156:1 death 59:1 60:4 124:16 159:23 debilitat e 159:13 December 20:5,25 21:18,20 decent 143:18 decibel 96:11,20 97:8 112:11	decibels 68:23 69:2 decided 55:11 59:10 86:14 104:6 deciliter 160:18 decision 53:17 56:7 109:11 decisions 32:20 33:24 35:14 40:13 dedicated 53:5 deemed 123:20 124:9 125:13 Def 66:20 68:20 93:1 defendant 33:11 defendant s 12:16 23:4 26:12 127:12 defense 16:15 defined 47:5 definitio n 39:7
---	--	---	---	--	--

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

degree 18:6,8 19:9	departmen t's 32:4 49:1,3 72:14 101:19	67:3 95:14 113:17	53:14 describin g 32:8	determina tion 78:1 167:20	different 13:18 38:12,17 43:16 52:3
delay 147:12	105:6 108:19 157:11	deploymen t 66:3 90:11 91:16,19 92:12 93:24 94:2 95:20,21 111:20 112:21 115:11 130:2,9	design 65:9 designate d 12:4,11 designed 63:25 64:25 65:8	determine 85:1 109:8 128:2 determine d 85:3 122:24	58:13 59:20 61:5,21, 23 64:22 65:9 68:17 69:1 74:13 75:4
delayed 67:10 163:7	depend 115:24		designee 170:21	detonatio n 63:23	76:12,20 79:25 90:3,10 94:1 109:1 123:22 155:14 167:7
dementia 11:4	depends 82:22 123:17	deploy ment 5:19,24 6:5 11:12,14, 16,21 15:11 16:11 17:7 19:19 20:1 21:23 23:22 29:22 30:24 46:24 47:17,20 48:18 49:23 53:2,8 56:5 73:21 82:20 86:12,17 87:9 92:21,25 97:2 107:16 120:5 136:7 153:15 154:18 169:25 170:22	deposited 144:22 depositio n 6:3,7,11, 23 7:5,7, 14,19 8:4,14,23 9:12,15, 19,21 11:8,9,22 12:8,14, 19 13:21 33:1 98:3 156:13 158:19 169:5 170:20,24 depositio ns 13:1 14:15 144:14 describe 27:9 33:7 34:11,15	developin g 112:10,13 device 61:10 65:10,19 66:11 81:6 93:11 devices 60:23 65:13 dictate 90:13 95:24 dictates 102:2 dictating 119:15 dictation 70:21 differenc e 43:19 differenc es 94:1	
depart 25:11	deployed 63:2 69:3,11, 13,21 70:9 71:8,16, 20,25 91:16,21, 22 93:16 94:12,22 95:11 96:14,22 97:1,15 110:5 159:3 deploying		destroyed 41:19 destroyin g 45:4 destructi on 78:7 143:21 details 77:13 134:17 detective 13:3 20:9,10 27:21 38:6 134:11,12 136:5 detective s 25:4 123:19 Detention 132:3		
departmen t					difficult ly 9:16 difficult 9:2 162:6 168:17 diminish 163:12 directing 65:21 direction 29:15 54:16 directly 62:10,15 91:25 92:8,15, 18 94:20 96:21 97:9 106:13 director 47:2 50:2 134:5

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

155:20	159:1,11 169:17,21	diversity 21:25	46:11 58:10,13 66:8,16, 24 67:1, 7,8,14 68:7,10 77:5,11, 14 78:2 80:19 81:6 83:2,24 84:9 101:23 103:22 109:4 118:18 119:4 125:1,4, 11 126:5 130:14 133:1,3 137:4,10 140:7 143:4,14, 18 158:17 161:22 162:14 163:3,4, 11 164:6	drawn 120:2	eardrums 112:11,13
disagree 110:19	disputes 84:23	divert 65:20 66:17,22 67:17		drugs 10:24	earlier 52:8 88:2 158:12,19 168:2
disagreed 111:15	disputing 88:1,3 144:6 154:13 169:22 170:2	document 98:23 99:3,25 114:12		due 56:1 58:19 65:2	
disciplin e 128:24		documenta tion 37:5 100:6		Durante 13:5	early 21:19 125:15 130:2 143:1 166:7,16 167:8
disciplin ed 26:12,16 130:1	distance 94:21,24 95:13 96:9,11 97:7,11, 12 113:17 162:6	documente d 36:2		during 7:5,14,19 8:4,13,23 9:12,15, 19,21 44:11,25 45:11 46:21 54:8 58:18,21 66:9,13 106:14 124:21 152:24 153:1 165:5 167:9 169:4	easier 19:24
discretio n 103:12	distincti on 94:8	documents 12:15 13:22 35:8 36:7 98:22 99:12 104:17 123:18,21			East 124:17
discuss 37:3	distingui shed 58:17 128:18 137:2 155:10	doing 23:1 29:7 66:18 83:3,15 144:16 158:8 162:12,13	dope 149:24 167:18		educated 11:15
discussed 132:19	distract 65:12 67:4,16 80:18 109:3 112:19 113:12 159:13	done 8:22 11:21 12:17 120:20 151:4 162:9 163:10	down 7:4 8:7 9:3 48:16 96:6,7,8 137:10 160:13	duties 25:16	education 18:5
discusses 33:8 34:12 98:24				dwelling 39:11	effect 98:18 101:16 137:1 154:24 157:24
discussio n 138:12	district 38:6	door 40:1 42:22 44:11,14, 15,17,20 45:1,4,20	Dr 156:15	dynamic 45:12 48:22 49:17 140:21	effective ly 35:12
discussio ns 26:7	diversion ary 60:23 61:10 65:13,19 66:11		draw 70:12	drawn 120:2	effort 157:16
disease 11:5			drawing 123:3	drawn 120:2	efforts 137:18,21
disorient ate 61:10 158:7,15, 21			drawings 70:23	drawn 120:2	either 22:18 26:8 29:9 37:13 55:24 56:13 61:18 67:18 72:23 90:10
dispute 86:6 138:23 150:25 151:5,8 153:16,22 154:7				each 12:21 81:24	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

138:18	enforceme	159:16	environme	even	79:11,24
139:1	nt	entirety	ntal	9:5 32:11	114:22
166:11	30:23	101:6	140:4	37:10	117:17
elderlies	31:6 57:5	110:8	equal	56:1	everyone'
111:18	enforceme	119:10	45:2 58:3	60:16	s
elderly	nt's	entity	equated	63:20	112:15
110:11	135:3	11:11	86:23	64:14	everythin
111:12	enough	entry	equipment	76:11	g
112:5	85:3,12	23:1	29:8,11	80:5	7:4 28:3
else	86:23	34:15	154:23	83:18	31:5,22
8:25	97:10,12	38:14	error	85:2	35:18
92:11	100:4	39:8,13	7:17	101:3	56:8
123:10	108:14	40:3,12,	errors	102:1,18	75:10
employed	110:9	20 45:8,	129:13	120:20	76:17
18:17	111:5,11,	18,25	escape	121:3	77:11
19:8,11	16,23	46:11	52:14	122:6	115:8,11
employees	143:13,17	49:4	67:19	123:7	evidence
85:20	149:5	50:11	77:5 78:8	126:1	36:9
employmen	ensure	55:19	143:22	134:6	41:18
t	58:22	59:9,11,	especiall	139:18	45:4 78:7
15:14	entailed	23,24	y	141:12	110:9
21:22	66:17	60:17	116:16	146:4	131:25
encounter	153:5	66:9	135:17	152:7,9,	143:22
78:6	entailing	67:2,7,15	162:6	13	167:22
142:20	152:20	71:25	essential	event	ex-
143:23	enter	73:25	ly	77:13	girlfrien
146:13	33:17	74:20	10:14	138:4	d
160:9	51:2	76:8	17:10	eventuall	27:12
encourage	65:21	80:20	43:8,14	y	exact
145:24	74:5 76:4	82:4 83:4	45:10	59:24	44:1
end	78:25	139:9	48:23	67:7	68:16
43:1	80:24	140:9,21	53:1,6	ever	75:9
93:14	84:18	144:12	63:6	6:7 21:21	107:3
105:24,25	113:25	146:18,	81:15	22:1,4,24	114:2
108:8	119:20	19,22	137:12	27:22	160:18
113:5	122:14	147:18,20	164:13	34:18	exactly
118:22	139:3	153:20	165:9	62:3 74:2	24:25
121:17,19	142:2	156:11	establish	76:22	121:11
122:6,18,	144:17	163:5	44:7	98:9	EXAMINATI
21 164:8	147:24	165:5,23	45:16,17	102:7	ON
ended	entering	entryway	89:12	114:12	5:10
27:14	40:8	45:20	environme	147:3	example
125:2	45:20	62:23	nt	160:22	11:4
	46:2		evaluated	every	39:20
	67:19		128:5	37:5	65:9
	82:18			73:22	
				74:9,12	
				76:19	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

117:22	experts	fact	102:24	familiar	68:24
120:17	15:21	7:18	109:8,9	30:17	92:24
exceed	explain	26:18	110:16	33:3	93:2,4
32:11	7:12 9:14	36:2	111:12	34:3,7,9	95:10,13
excellent	10:5	42:20	112:24	37:10	96:4,15
8:22	12:17	64:11	123:3	42:12	97:1,7,16
excerpt	19:25	95:2	124:8,9	93:5	103:22
98:6	41:12	97:15	131:4,11,	114:16	felt
169:1	60:25	118:8	13,16,17	115:10	96:14,25
excerpts	140:1	119:22	133:1	134:19	female
169:3	explained	125:16	138:13	familiari	125:3,5
execute	145:5	147:14	140:5	ze	few
42:24	explosion	152:15,17	143:21,23	115:4	24:2,16
139:15	92:17	159:15	144:9	family	169:6
execution	explosive	168:3	145:7,13	105:12	field
15:6	125:1,2	factor	166:6	far	19:21,22
148:18	128:6	78:11	167:14,	8:23	20:5,7
exhibit	129:3	84:11	16,20	13:10	figure
11:23,24	130:2,9,	104:11	facts	31:19	84:24
12:2	13	118:4	111:7	49:10	124:4
98:2,4,6	132:23,	141:24	142:11	138:20	147:15
99:22	24,25	142:4,10,	143:10	147:7	filed
114:4,5,7	extend	13,22	factual	148:8	5:22
152:9	68:19	143:15,16	77:17	fatal	filings
168:21,	extent	144:19	fail	5:25	126:25
22,25	18:5 24:3	145:15,	39:12	FBI	final
exit	127:1	164:3	failed	20:20	29:14
52:24	169:16	166:21	35:23	feasible	finally
expect	extreme	167:12	36:1	55:25	50:1 83:3
78:6	11:4	factored	failing	56:1	find
experien	eyes	143:7	127:10	features	13:22
e	63:4,7,11	factors	129:2	168:17	35:9 36:7
17:2	127:3,7	41:2,4,7,	failure	February	37:5,11
28:10	150:22	10,12,20	36:15,18	20:23	74:7
56:10		44:10	43:25	federal	98:24
151:18	F	45:15	50:8	11:9	160:7,9
160:6		55:4,5	failures	43:20	161:1
expert	face	56:2	148:17	50:12	finding
15:16	90:6	57:21	149:11	114:20	86:1
16:16	164:17	74:15,16	151:2	feel	87:15
46:23	165:10	76:16	fair	63:19,21	144:6
158:22	facility	78:3	15:4 82:7	139:14	findings
159:8	123:22	79:16	fall	feet	51:6,10
		80:1 82:6	112:7	54:25	86:6,10
		86:14,17			
		88:6 90:3			
		99:8			

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

87:17	firing	65:13	15:3,24	108:14,	33:17
88:3,15	161:14	66:11	16:17	17,20	46:2
128:20	first	flash-	19:4,13,	109:5,18	57:17,18,
148:21	6:10,15	bang	25 20:2	112:3,10,	25 58:2,3
151:1,5,8	7:25 8:14	93:11	21:4,5	14,18	61:2 74:5
153:24	10:6	flashed	22:19,20	114:7	75:3 76:4
169:8,18,	12:18	63:7	24:23	117:14,23	77:22
21,24	17:4	flashligh	25:5	118:17	78:24
170:2,3	18:13	t	26:1,17	119:2,14,	80:7,13,
Findley	19:18	164:14	27:16,21	17 120:5	24 81:1
54:6,7	27:10,11	flashligh	28:11	122:5	84:18
104:6	37:18	ts	29:17,21	123:10	93:12
110:3	53:24	164:20	30:2 31:8	124:2	113:25
127:16	71:16	165:10	34:16	125:10	120:25
129:1,4,	72:17,20	flood	35:11	127:23	121:2
17,22,24,	73:8	45:21	37:23,25	129:2,18	136:25
25 152:1	80:23	fluctuate	39:6,20,	130:23,25	142:2
156:15	81:5,10	41:11	25 41:6	131:8,9,	144:16
Findley's	105:18,	follow	45:23	24,25	147:24
156:12	22,23,24	31:16	46:10,17	132:6	forced
finish	106:6,20	97:22	47:12	133:6	144:11
9:8	107:2,7,	following	49:12	134:7,14	forcefull
finished	10,13	5:25	51:14	135:21	y
9:7 19:22	108:3,7	77:16	53:3,14,	136:14,16	40:7
121:4	115:22	101:20	15,23	139:10,19	82:18
122:8	116:7	105:7	54:5,12	140:6,13,	forcible
fire	118:25	Fomby	56:14,17	23 141:25	34:14
65:3 90:8	126:7,18	16:19,21,	57:22	143:17	38:14
92:16	139:7	24	58:20	148:12	39:8,12
firearm	143:5	Fomby's	60:24	149:25	40:12,20
59:23	147:23	16:22	61:14	150:11	45:18
164:14	fit	foothold	65:9,14	152:15,	74:20
firearms	45:13	140:8	68:6,9	17,19	76:8
145:3	52:6	for	73:4	155:16	146:18
fired	five	5:13,22	75:14	156:18	forcibly
60:6	147:2	6:11	78:16,24	157:6	45:19
71:9,21	five-	7:23,25	80:6,11,	159:3	foreposit
72:1,7	minute	8:3,14,19	15,16	162:18	ion
165:13,24	75:15	9:2,7,10,	82:17	165:6	151:18
firefight	five-	23 10:16	83:11,13	166:3,15	foresee
60:3	second	11:14	85:13	168:7	78:5
firefight	79:13	12:14	88:24	170:21	form
er	flash	13:21	89:12,14,	force	7:9 31:1
19:17	60:22	14:2	17 90:8	16:9,11	32:12
	61:22		99:14,18	20:21	35:15,24
	62:1,4,12		102:23	21:8	36:16
	63:24		103:23	23:19	
			104:13	24:20	
			105:15	26:2	
			107:23		

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

40:16	formally	Fremont	154:9	Garth	getting
43:12	146:9	160:13	157:17	54:6,7	19:8
47:10	formed	frequentl	158:8,17	104:6	23:18
48:12	85:19	y	159:6	127:16	69:22
49:6	former	22:22	161:21	129:1	Gilbertso
51:17	15:23	23:10	162:6	gates	n
57:7	forth	24:12	168:25	54:20	15:22
58:24	12:23	25:21	169:3	gave	give
64:7	fortifyin	64:6	front	35:4	6:3 8:5
65:16	g	friend	6:18 27:1	107:2,4	9:25
76:23	45:3	16:13	66:24	108:7	19:25
79:7	found	from	67:1,14	146:16	33:12
80:14	84:17	13:1,16	68:10	general	44:23
81:7	86:12	14:22	80:19	8:24 39:9	58:12
83:17	128:11	16:8,10,	81:6	55:9	61:11,16,
85:7 86:9	129:12	11 28:3	83:2,24	169:10	17 63:9,
87:5	153:12,19	32:20	84:8,9	generally	16 68:10,
90:16	167:23	33:11,25	90:6	10:8 30:1	11,16
93:20	168:1	49:17	103:22	33:7	74:19
94:15	four	52:3	109:3	35:10	76:14
95:5	12:2	66:18,23	125:1	60:25	77:10
96:17	19:1,4	67:18	137:10	124:20	94:23
97:4,21	23:12	68:24	158:17	gentleman	100:21
99:24	24:14	69:16	162:14	's	102:2,5
106:9	27:2 29:4	71:21	164:6	16:18	104:2
114:18	52:13	77:23	FTO	get	105:3
117:15	54:18	82:8,15	20:6	15:13	107:22,24
127:14	120:19	94:24	full	18:3	108:2
128:4,14	159:20	95:10	49:9	19:2,14	109:17
129:15	162:17	97:1,11,	134:14	38:7	119:3,21
147:5,16	170:22	16 98:6	153:10	45:12	122:11
148:6	Fourth	100:16	155:24	54:10	137:18
151:13	33:22	102:20	fully	61:8,15	145:6
152:10	42:6 43:9	105:19	55:11	68:6 77:4	167:12
158:2	48:13	109:3	71:20	87:8	given
161:19	49:3	110:12	113:9,11	95:21	6:7,10
165:1,11,	89:25	111:24	140:15	137:5	33:13
19	90:15	112:4,24	150:5	139:20	36:10
formal	93:12	114:8	G	140:7,8	46:6 55:6
36:7 76:2	frame	116:24	gang	143:14,17	67:6,12
101:19	161:23	118:21	20:21	163:11	73:1,20
105:6	free	120:11	gangs	gets	80:2,3
108:19	112:19	122:16	73:14	63:7	86:13
113:22	freely	124:22,25	132:6	136:25	93:10
136:6	113:12	133:1		152:4	96:11
formalize		143:16			97:7
d		148:9			106:12
79:21		150:16			107:8
141:3					

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

114:2	72:25	66:14	104:12	149:21	happened
117:22	73:16	68:11	106:14		15:8
119:9	79:8 85:8	72:13	107:21	guidance	26:8,14
125:15	88:7 90:6	73:24		100:21	60:20
138:13	97:5	74:12	govern	104:22,24	84:3
141:11	107:19	75:14	156:7	114:8,17	126:6
142:18	120:19	77:10,13	governs	115:14	130:24
149:1	121:3	78:5,6,16	42:14	116:2	132:21
151:17	127:15	79:12,14	graduated	117:6	151:12
153:1	129:16	86:5	19:3 20:4	121:10	158:10
165:4,18	130:10	90:6,10		gun	happening
168:11	133:5,16	97:8,25	graduatin	64:24	66:10
gives	145:19	102:19,20	g	145:21	happens
38:12	153:9	104:15	18:25	gunfire	28:3
117:6	154:22	110:10,19	grainy	65:4,11,	103:22
119:8	155:23	111:11,17	168:16	15,22,24	
138:19	157:21	112:22	grams	66:12	happy
140:17,20	158:3	115:24	69:1	gunshot	8:2
giving	166:7	119:16	Granville	64:3,9	148:12
40:10,11	167:20	120:23	34:2,21	gunshots	hard
49:22	goal	121:7	37:10	64:6,16,	168:19
67:1	66:6	123:15,	100:21	25 71:12	harm
78:1,14	goes	17,18,21	graveyard	H	40:25
82:20	6:25	124:14	20:14		92:14
83:2,5	34:13	133:16	greater	hadn't	having
118:4	40:18	138:21	43:11	152:22	78:3
147:15	62:24	144:21	Greg	half	164:13
161:22	68:22	148:21	15:22	62:8,9	hazards
162:23	75:10	149:6	grenade	69:9	90:8
go	76:11	159:18	69:5	75:14	he'll
5:14 8:15	78:4 99:5	161:10,	Grimmett	160:14	10:12
10:1 14:5	126:8	15,18,21	134:12	hand	head
22:4,8,13	141:17	167:8,11	ground	56:19	8:7,16
31:2	144:24	168:20	84:3	61:13,15	96:1,3
32:13	167:5,16	gold	95:15	98:1	hear
35:16	going	162:2	96:4	114:3	10:7
38:3	6:13	163:8	group	handled	44:13
40:17	12:19	Gonzales	29:8	151:6	71:24
43:13	15:13	14:25	guard/emt	hands	82:14
49:7	29:14	24:7,8,17	19:13	53:4	144:23
52:25	32:25	good	guess	hanging	158:1
54:12	36:23	5:12 7:24	37:21	130:12	159:10
59:6,18	37:16	115:3,6	46:23	happen	163:19
61:18	49:16	116:13	115:9	62:14	heard
62:19	52:9,14,	got			64:15
65:17	20,22	69:1,7			
69:25	54:17	80:5			
71:1	56:8	87:4,7			

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

77:19, 23	Hey	hold	25 26:25	108:11	48:4, 24
96:13	77:9	139:3, 25	30:2		52:5, 9
144:15	hi	140:16, 22	37:19	I	54:25
163:15	24:2	141:6, 14	43:23		56:4
hearing	hide	156:2	47:5	IAP	59:13, 22
44:12	145:22	holding	52:3, 25	13:5	62:10, 14,
105:18	high	141:2	62:6, 15	IAPS	23 63:2,
159:14	18:25	holds	63:5	151:6	20 64:12
163:21	19:3	140:25	72:15	idea	66:6, 14,
Hector	46:21	home	73:23, 24	18:3 20:1	25 67:8,
17:15	95:16	27:12	74:3, 19	91:22	16 71:24
held	122:25	44:25	76:2	115:4	73:9
18:23	123:1, 13,	homicide	79:21	119:2, 3	77:2, 4, 25
147:4	20 124:6,	123:11,	82:2, 16	149:17	78:5, 21
help	9	13, 16	93:16	identifie	79:15
123:19	high-	124:1, 7,	95:10, 16,	d	85:12
here	decibel	12 132:1	25 96:19	11:24	86:3, 12
6:3 7:13	65:19	horizonta	113:23	98:4	87:18
9:20	high-risk	l	116:24	114:5	90:10
11:6, 19	157:12	96:2	119:4	168:10, 22	91:10
12:5	higher	hostage	122:24	identifie	92:10, 15,
15:14	58:1	61:4, 18	126:12	r	18 93:7
19:3 25:2	92:20	162:12	132:24	99:14	94:11
26:4	130:16	hour	133:17	identity	96:2, 6,
32:16	highlight	12:21	138:9, 20	40:2	13, 21, 25
37:1, 17	ed	75:14	141:25	if	97:15
50:6	12:3	78:22	146:15	6:18, 25	99:9, 10,
55:23	highly	79:2	155:10, 13	7:11, 13,	12 102:25
56:2	161:2	83:19	156:5	25 8:8, 12	103:2
68:14	hired	hours	162:1	9:5, 22	104:16
72:13	19:14, 18	10:22	164:10, 16	10:1, 9	105:11
91:3 94:8	46:23	11:1	However	11:11	106:5
101:11	histories	31:19	7:12	12:13	107:13
115:22	124:12	83:13	huge	21:24	108:11
116:6, 24	history	143:1	123:16	22:22	110:10
117:22	131:19	153:9	Huh-uh	24:4 25:1	111:17
118:3	132:5	166:16	8:8, 15	26:4	113:3, 5,
119:22	hit	house	Hundreds	29:6, 14	10, 14
120:5	166:7	42:23	49:15	31:4, 8, 14	115:1
122:15	hits	140:14, 15	hypotheti	36:13, 17	116:16
135:15, 17	63:3	149:24	cal	38:7, 16	117:23
141:14	hitting	how	107:18	39:6	118:4, 5,
142:5	58:13	6:13 9:15	119:21, 22	41:14, 15,	6, 9, 10
144:7		10:18	137:19	16 42:24	119:2
Herring		17:16, 20,	hypotheti	44:16	120:25
21:6, 7, 11			cally	45:15, 19	123:2, 15,
22:8					18 124:13

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

134:6,16	impaired	11,15,20,	64:11	7,15,22,	19,20,21,
136:15	158:24	21 20:5,	65:8	24,25	23
137:9	159:9,22	8,9,10,	66:19	117:3,22	158:16,
138:22,25	163:21	12,14,18,	68:2,12	118:8	19,22,25
139:13,18	164:24	21,22,23,	69:14	120:17	159:3,15,
140:17	implement	25 21:2,	70:3	121:2	21,25
141:3	154:22	19 22:6,	73:2,9,20	123:18,19	160:6,19,
142:14,25	implement	16,25	74:7,15,	124:1,5	24 161:7,
145:15,19	ation	23:24	21 75:8	125:7,16,	9,21
148:19	68:19	24:1	76:17,21	17,19,25	162:5,7,
149:6	109:19	25:2,4	78:11,12	126:12,25	12,20,22
153:5	136:1	26:4,14,	79:21,25	127:12	164:2
154:18,19	implement	18,23	80:1	128:1,16,	165:3
156:25	ed	27:1,4,	81:18,20	21,25	166:16
157:9	138:7	13,14,22	82:2,12	129:11,14	167:9,23
158:9	156:10	28:3,24	83:9,15,	132:7,8,	168:3
159:5	implement	29:14,25	18 84:9	25 133:2,	169:7
163:18,20	ing	30:20	85:12	22 135:2,	170:1
165:21	141:9	32:8,17,	86:5 87:3	10,17	inability
168:3,19	important	21 33:1	88:22	137:1	161:17
169:7,20	7:23	34:15,17,	90:6,7,	138:21,23	inadequat
ignited	improper	19,20	12,23	140:3,23	e
92:17	112:1	35:22,23	91:14,23	141:3,4	151:9
ignites	improperl	36:6,7,9,	92:11	142:9,10,	inches
69:8	y	13 37:3,	93:1,9,	22 143:2,	72:10
ignitiati	106:7,11	11,16	18,22	11,19	92:24
on	110:14	38:4,10,	94:17,24	144:3,10,	incidence
126:8	151:6	12,15,17,	95:2,20	12,14	37:6
ignition	improve	22 39:9,	96:2	145:2,8,	incident
63:23	109:20	11 41:15	97:1,15	9,13,15	13:10,19
70:1	in	42:20	98:8,18,	146:6,16,	14:21
ignore	6:5,17,18	43:24	22 99:25	22,24	15:2
10:14	7:7,8,13,	44:6	100:8,13	147:11,	26:17,20
imagine	15 9:17	46:2,12,	101:6,8,	13,14	35:2,22
120:1	10:22	15,25	16 102:22	148:5,16,	37:14,15
immediate	11:15	47:6,8,	103:19	20 149:1,	46:14,17,
78:7	12:4	11,20,22	104:16	6,8,17	19 47:7,
immediate	13:9,12,	50:8,17	106:1,3,	150:5,19	18 49:13
ly	21,23	51:16,24	19 107:24	151:2,9,	50:6,20
9:20	14:16	52:4	108:2,14,	18,21	53:16
67:23	15:1,5,	53:11	23 109:6,	153:14,	56:17
69:18	11,14,17	54:2,14	19 110:18	16,22	59:14
80:8	17:10	55:9	111:12	154:7,12,	60:16
126:17	18:7,10,	56:13	112:13	23,24,25	79:10
	25 19:1,	57:9 58:9	113:23	155:6,7,	83:24
		59:20	114:10,	19,20,22,	86:16,19
		60:4,16	15,21	24	88:16,22
		61:18,21	115:2,3,	156:16,	
		62:23	10,13,19,	17,24,25	
		63:2,7,19	22 116:1,	157:9,18,	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

89:13,20	incorrect	145:1	111:14	126:1,6	intention
98:13,18	51:16	150:16,	113:13	131:6	159:12
99:10	88:13	18,19	inserted	132:10	interacti
115:13,20	Indian	156:21	91:17,24	141:12,	ons
117:20	27:14	157:2,5,	94:18	13,15	16:11
123:23		16	109:20	144:16	interest
124:16,21	indicated	inherentl	158:6	158:14	123:25
126:15	138:3	y	insertion	163:1	168:10
127:8	individua	93:10	67:12	166:5,18	internal
128:2,16,	l	initial	68:5	167:23	107:11
25 129:11	23:4	152:3	89:24	instances	internall
130:3,6	26:12	initiate	90:1 92:6	27:3	y
132:21	68:24	68:2	104:3	instants	26:17
133:19	142:21	initiated	109:18,21	90:10	interrupt
135:10,14	individua	70:25	110:6,9	instead	169:19
137:6	lly	125:2	111:3,8,	59:14	into
138:16	14:18	initiatio	25 112:3	institute	15:13
141:5	21:22	n	121:15	d	19:4 24:4
145:13	individua	81:9	122:12	115:19	49:14
161:12	ls	125:14	inside	instructi	52:15
incidenta	78:7	128:6	40:1,25	on	66:21
lly	124:10	injured	41:16	28:25	68:4
123:6	132:1	126:22	44:13	29:18	72:13
incidents	168:6,9,	injuries	45:2	32:19	77:1,7
46:20	13	127:1	57:22	36:10,13,	79:14
47:19	informal	128:19	58:7	14 153:1	81:2 83:4
include	76:2	129:14	59:21	instructi	88:7 90:4
10:25	101:19	injuring	60:19	ons	91:8
35:5	105:6	125:3	61:11	6:13	93:13,24
105:9,16	108:19	injury	63:24	163:16	94:2,10,
106:6	113:22	91:13	67:17,22	insuffici	18 109:1
107:14	135:18	113:8	68:7	ent	112:8
includes	136:7	127:3	77:19,23	99:22	113:9,10,
28:13	141:2	inner	78:5,23	intel	13 134:17
including	informall	42:22	82:13,15	74:10	139:20,22
72:16	y	innocent	90:11	75:11	140:8,9
Incomplet	36:3	93:14,18	91:12,22	111:11	141:18,25
e	141:7	112:16,18	92:3,5,10	137:7	143:7,23
107:17	informati	125:20	93:22	intend	154:10
inconsist	on	insert	95:23	158:6	156:2
ent	45:13	68:1	97:24	intended	158:6
66:3	101:12	80:25	111:18	158:5	164:7,17
incorpora	108:14	92:7 93:2	112:15,18	intends	165:9
te	111:6	109:1	116:17	169:20	166:7
42:18	137:7		117:24		167:20
	142:18,19		118:5,11		
			124:14		
			125:23		

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

intoxicat ion 161:3	57:23 124:1,18 127:11	17 38:12, 24,25 39:7	11,23,24 73:4,17 76:10,12,	16 110:4, 24 111:1, 3 112:2,	153:8,25 154:18,21 155:2,4,
introduce 66:21 80:17 90:2	128:25 138:22 140:23 150:19 161:6	40:18 41:10 42:19,20, 21 43:15, 23 44:2,	13,19,25 77:2,8,25 78:4,15, 19,23 79:5,17,	4,15,25 113:5,11, 13,17 114:20 115:3,6,	5,6,7,11, 12,23 156:22, 23,25 157:1,3,
introduce d 82:25	168:12	10,12,13, 16,21 45:13,22, 23 46:17,	22 81:8, 14,15 82:2,10, 13,21	22,25 116:14, 15,24 117:3,4,	6,9,21 158:6 160:1,7, 12,24,25
introduci ng 88:10 90:4 112:25	15:5 27:25	19,20,24 47:4,5,7, 12,13,16, 17,21,23 48:15,18,	85:1,11, 17 86:12, 16 87:3, 4,7,18, 20,22	5,6,10 119:17 121:2,10, 18 122:6, 24 123:6,	161:20 162:3 163:1,3, 18,20 165:16
introduc tion 12:6 81:2 119:18,19	involves 57:16,17	21,22,23 49:3,4,24 50:1,3, 10,16,23 52:3,17,	88:7,16 89:5,20, 23 90:1 91:7,10, 11,13,16 92:6,7,9,	12,17 124:7,9, 18,24 125:15 126:8,10, 17 127:25	166:4 167:2,4, 5,8,16, 17,19 168:2,3, 15,19
intrusion 81:2	iron 54:19	53:4 54:9,10, 13,14,16, 17,24 55:5,11, 24 56:5,	18 93:3, 7,11,13, 25 94:2, 4,5,11, 12,17,23 95:11,14, 21,25	128:11, 16,18 130:9,10, 15,18 131:3,5, 24 132:1	169:15 it's 5:16 6:10 8:14 11:13 14:21 17:21 28:6 29:3,9,18 30:21 31:20,23 33:9,16 34:8,20 36:1 38:12 41:14,15 43:14,18 45:10,11, 12 47:6, 8,23,24 48:23 50:25 52:18 53:1 57:8 58:16 61:16
investiga ted 55:8 124:8 132:6	issue 21:25 101:20	54:9,10, 13,14,16, 17,24 55:5,11, 24 56:5, 13,14,17, 23,24 57:16,17, 24 58:15, 22,23 59:8,13, 25 60:19 61:13 62:4,11, 15,22,24, 25 63:1, 2,4,5 64:8,12, 20 65:11, 21,24 66:1,2,21 68:22,23 69:8 70:5,10, 14,22,24 71:1,6,7,	7,11,13, 25 94:2, 4,5,11, 12,17,23 95:11,14, 21,25 96:10,18 97:9,23, 24 98:19 99:5,9,10 100:19,21 101:7,8, 25 102:3, 4,11,21 103:2,4, 8,15,17, 18 104:1, 4,8,13, 15,18 105:2 106:1,3, 10,12,15 107:10 108:2,4, 8,10,24 109:1,7,	137:12, 13,15 138:15,25 139:1,8 140:6,13, 17,20 141:3,8, 17,25 143:19,20 144:17,24 145:12,15 146:22,25 148:24 149:21 151:21 152:5	
investiga ting 123:6,7, 11 124:1 128:1	issues 90:24 114:17	6:19 7:23 9:2 10:5, 12 11:22 13:12 15:4,7 18:9 19:3,24, 25 20:8, 16 21:11, 24,25 22:18 27:6,7, 11,13 29:8 30:22 31:11,13 32:3 34:11,13 35:2,13 36:3,13,			
investiga tion 27:5 50:7 123:17,20 124:25 128:21 134:15 146:14	it 6:19 7:23 9:2 10:5, 12 11:22 13:12 15:4,7 18:9 19:3,24, 25 20:8, 16 21:11, 24,25 22:18 27:6,7, 11,13 29:8 30:22 31:11,13 32:3 34:11,13 35:2,13 36:3,13,				
involve 73:6					
involved 15:1 47:20					

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

62:12	its	101:17	96:13,25	113:5	kidnappin
63:9	5:24	110:5	just	114:7	g
64:13	32:18	124:17	7:16 8:16	123:3	27:16
65:4,6	35:12	155:7	10:15	124:20	kids
66:8	65:2	Jasmine	14:21	128:11	111:17
68:20,21,	69:18	13:8 26:9	15:14,18,	129:18	167:11
22 69:1,	74:9	124:19	20 16:11	132:18	killed
6,7 72:15	84:15	125:5	18:20	134:17	58:21
73:24	97:20	128:1	19:2,24	135:20	131:22
78:12	104:22	130:1,5	23:3	136:8	kind
79:9	107:11	132:21,22	26:18	137:11	33:9
84:25	110:19	Jimmy	30:1	138:12,19	52:17
85:23	111:4,20	13:4	34:11	143:4	54:22
87:3,9	117:14	job	35:10	150:15	72:10
88:20	itself	8:23	36:1,6	152:16,17	120:18
89:4,17	50:25	26:22	37:17	162:11,	130:13
90:5,10	55:9	35:23	38:3,9	18,22	133:23
92:15,18,	68:18	151:22	39:6	164:10	140:8
19,21	99:22	Joey	40:19	167:14	167:17
94:16,22	100:1	21:6,19	42:21	169:1,5	kinds
96:19	108:23	22:7	43:15	170:9	61:21,24
98:7	123:2	join	44:14,16,	justice	68:17
103:3	126:15	18:13	19 46:19	18:7 19:9	King
104:25	132:11	joined	47:6,22,	K	13:8 26:9
105:11	145:10,13	18:15,24	24 50:5		124:19
108:6	146:21	19:5	52:16	keep	125:5,16
112:11,18	148:10	jokingly	53:20	68:23	126:4,21
113:2	J	160:17	56:14	81:18	128:1,25
114:10		judge	58:16	112:4	130:1,5
116:6,25	Jacob	6:18,24	60:25	161:21	132:21,22
117:4	54:2	9:20 10:1	61:14	keeping	King's
119:9	Jake	38:5	65:7,10	51:19	129:14
120:9	14:23	July	66:16	Kentucky	knew
121:5	104:5	18:2,15	68:18,20	134:25	16:10
134:24	111:9	21:2	69:23	135:1	26:2 83:8
136:3	James	jump	70:10,19,	Kerry	96:22
138:14	25:8	143:4	22 71:24	15:2	111:8
140:16	69:15	145:23	73:21	23:5,11	132:3
142:9	127:17	June	76:12	kicked	141:12
145:22,23	January	20:23	77:21	137:15	150:11
146:11	6:1 15:7	jury	85:23	kicking	168:3
157:20	21:20	6:18,25	89:12	137:10	knock
158:5	35:3 51:3	27:1	91:5 93:7	kid	33:10
162:11,	53:16	84:25	94:12	168:19	35:12,18
18,20,22	80:23		96:19		38:13
163:25	88:22		99:10,25		39:1,4,
164:1,2,			103:5		
13 167:5			104:25		
168:16			108:7,12		
169:1					

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

15,16,24 40:7,9,14 41:6 42:5,18 43:9,20 46:8,12 47:4,9 49:5,10 50:12,18 53:11 66:3,6,25 72:14,18 73:7,19, 25 76:5 85:4 86:8 87:23 88:24 89:14,21 98:24 99:4,23 100:12 101:21,22 102:1,4, 8,11,13, 15,16,18, 19,23 103:1,7, 9,13,24 104:1,4, 7,9,12, 14,19,23, 25 105:1, 3,7 115:15 118:15 125:9 127:10 133:15, 18,25 134:14 135:6 136:17 137:3 138:9,12 153:2,20 154:5 156:2,5,8 162:25	knock- and- announce 37:22 knocked 78:21 knocks 135:5 know 9:5 16:5, 8,25 18:20 21:24 23:4,17, 22 25:12, 15 31:4,8 33:2 36:5,17 37:3 40:20 41:5,16 44:13 48:4 52:25 54:16,18 60:5 64:12 69:3,16 70:11,15 78:9,10 92:2 93:7 94:10 95:17 96:8 98:20,21 99:10 103:20 104:16 106:1 115:6,23 116:16, 19,23 117:24 118:6,7, 9,10,11 119:5 124:13 126:5,12,	24,25 127:2,5, 16 128:10,18 129:21 132:18 134:14,16 136:2,14 137:10 141:3,11, 15 142:21 145:18 147:8 148:24 150:4 152:15, 17,19,22 153:5,7 155:14 157:8,19, 20 158:9 159:4,16 161:3 165:21 167:19 169:6,21 knowing 69:24 knowledge 21:10 26:11 28:10 35:4 70:16 132:9 150:5 known 25:3,5 124:13 Kubla 15:2 23:5,11 59:21 <hr/> L <hr/> labeled	169:2 language 46:15 47:3 48:6 49:21 50:17,24 51:20 89:5 117:10 133:22 155:25 large 54:15 Las 5:18,23 6:4 11:12 15:10 17:3,7 18:13,15 21:23 26:22 34:9 46:23 47:16,25 52:23 53:1,7 98:6 120:4 121:1 143:12 170:21 last 10:22 11:1 17:19 75:25 136:9,20 late 21:18 167:8 late-at- night 167:18 later 7:14,20 10:1	20:19 33:1 89:2 146:4 155:3,13 Latham 14:25 69:12 70:5,6,7 71:5 Latham's 70:13 Latia 5:22 law 6:18 30:13,22 31:6,8,9 32:22,23, 24 33:12 36:21 37:5 40:10,19 42:17 43:2,7, 20,21,22 46:23 47:24 49:1 57:1,5 73:9,10 74:1 75:5,6 79:23 82:8 86:18 88:9 102:11, 20,21,22 103:5 112:16 114:20 116:20,21 121:8 135:3,10 137:22,23 138:1 144:13 146:10	157:22 lawful 40:21 laws 29:25 76:12 78:13 156:7 lawsuit 5:23 Laying 96:7,8 layout 150:2 laypeople 64:5 65:25 layperson 34:11 lead 109:16 leader 24:10 54:1 59:4 86:20 103:16 109:14 129:5,6, 7,10 130:3 152:1,12 leaders 29:4,5 112:23 leadershi p 29:2 leading 151:21 learn 14:22 learning 73:8
--	---	---	---	---	--

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

100:8	legally	130:16	55:9 61:9	lines	location
least	10:11	levels	63:20	53:6	53:21
24:23	less	96:20	64:19	list	long
27:1	75:5	161:1,3	65:10,24,	11:13	12:5
32:4,6,9,	84:25	leverage	25 66:11	12:3,8	17:16,20,
10 35:22	97:1,15	112:20	69:2,4,5,	listed	25 25:5
49:25	116:16	lies	6 73:14	141:23	36:18
56:23	117:4,5,	13:12	90:9	listening	53:19
57:5,9	23 118:4	lieutenan	95:24	166:19	62:6,15
72:5 75:2	145:16	t	100:20	literally	73:24
89:19	147:2,4,	5:18 13:1	104:11	77:18	80:12
96:3	13	14:13	116:22	102:15	82:2,16
103:21	lessen	17:6,21	117:19	143:16	83:8
117:6	167:10	18:1	123:16	litigatio	85:3,11
118:16	lesson	20:2,22,	125:7	n	102:5,13
122:7	28:14,15	25 21:2,	126:25	15:17	105:3
141:5,6	37:7 75:9	6,7,11,	131:19	86:5 87:3	106:14
146:7,8	99:6	12,14	142:24	98:8,23	107:20
156:17	115:18	22:7,17	143:1	99:15	113:23
159:15	let	25:23	145:20,22	110:19	116:24
169:16	10:15	109:23	149:10	114:11	120:2,18
leave	31:11	113:1	151:21	148:16	126:12
22:23	78:18,19	133:13	155:9	153:17,23	141:25
117:2	82:5	151:25	159:16	154:8,12	143:17
leaves	98:20	152:6	160:9,18	157:24	longer
56:5	126:6	153:13	163:21	159:22	23:16
117:5	136:13	170:20	164:13	169:7	24:20
leaving	150:22	life	170:10	170:1	62:22
19:5	169:6	18:11	likelihoo	little	63:2,4,10
led	let's	142:22	131:5,17	9:16 17:2	142:16
28:6	14:5 17:1	light	likely	18:3,21	157:6
left	18:3	62:13	59:15	23:3 33:1	look
7:3 20:10	32:16	63:3,7	60:7 79:3	36:23	9:25 10:1
23:17	82:10	135:8	82:13	37:17	36:24
28:21	120:22	lights	123:2	38:3 63:4	47:20,23
95:6	133:5	164:1,8,	142:15	69:4	48:2
103:12	139:5	10,21	143:1	115:22	62:12
legal	147:22	like	165:16	164:13	75:8
11:11	lettering	7:12	166:4,17	lived	76:11
39:6	162:1,3,5	11:12	limit	18:10	81:12
50:15	163:8	19:3 20:4	112:24	local	85:1
82:8	level	27:7	135:10	36:4	looking
133:21	58:2,3	29:12,25	140:5	located	44:10
142:4	96:12	32:2 39:5	line	25:15	45:5
154:9	97:8	47:22	22:25		49:14
160:3	112:2,11	52:23	149:1		53:22
					62:10,14
					91:3

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

115:17	15,16	112:7	many	105:11	22:11
150:10	35:13		10:6	147:14	31:25
lookouts	make	mandates	26:25	matters	32:3
149:24,25	7:10,23	146:10	44:9	26:9	44:18,21
lot	9:13,23	mandatory	73:23	maybe	45:9
135:2	10:2,12	31:21,23	74:3,19	80:12	47:23
149:25	28:14	manner	76:2	120:2,3	52:2
155:22	29:18	11:16	79:22	131:15	57:24
loud	45:23	121:3	88:6	141:14	62:11
8:18	48:7 50:1	manual	95:10	me	63:6 75:4
low-level	52:22	13:11	127:11	7:25 8:1	77:11
61:1 81:1	55:22	34:20	144:13	9:7,10	78:9,10
lowest	56:7 58:8	66:23	146:15	12:17,18	79:10
57:25	59:7,24	75:8	149:23	15:3	112:6
LVMPD1490	60:17	81:10	164:7,10,	17:12	121:18
98:8	63:25	90:13	16 167:14	19:25	122:3
LVMPD4440	67:7,15	98:7,10	maps	27:9	131:15
169:2	68:16	100:11,	56:9	29:21	155:23
	75:23	13,19	March	30:5	163:22
	76:13	115:18	155:19	31:11	169:19
	78:1	119:19	marijuana	35:11,21	meaning
	80:19	122:13	159:25	36:12	39:20
M	82:4,14	130:17	160:3,8,	37:2	145:9
	86:25	140:24	10,14	39:6,14,	meaningful
made	90:5,7	141:4,19	161:11	23 41:12	1
7:6 22:2	102:25	142:9	Marine	53:14	7:15
46:25	110:25	152:21	18:25	68:16	means
53:17	119:22	153:7	19:1,4,5,	72:5	61:5
59:9,23	132:18	154:15,19	12	78:18,19	meant
83:4	168:17	155:14,21	Marines	82:5	44:16
109:10	making	156:3	19:15	91:20	55:16,17
129:12	34:14	manually	mark	93:17	129:21,23
148:4	38:14	67:6,13	168:20	99:21	measure
157:16	39:8,12	80:19	marked	102:17	122:16
165:23	40:20	82:4 83:1	11:22	114:14	measured
magical	45:18	137:4	98:1	115:1	118:21
53:5	59:11	manuals	114:3	116:9	medical
main	67:10	13:8,10	marks	122:3	11:3
14:24	73:24	manufactu	95:24	136:13,	127:5
15:1 41:2	74:20	rer	materials	15,18,23	medicatio
54:22	76:8	68:24	37:11	144:13,18	ns
mainly	103:16	93:1	matter	154:17	10:25
162:18	122:13	97:7,23	6:25	169:6,10,	meet
major	140:9	manufactu	26:14	13	31:7,8
20:18	146:18	rer's	63:5	mean	32:4,6
21:1	165:4	97:17,19		8:9,17	
22:11,13,	166:12			12:15	
	man			15:2,20	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

135:25	method	120:22	118:20,24	142:18,19	monitor
Melanie	47:13	128:2	120:9,23	143:21	132:2
54:11	methods	134:7	121:5	minute	150:11
55:13,20	141:22	135:15,17	122:17,23	115:25	monitorin
127:19,20	Metro	137:21	123:12	116:14,	g
148:25	14:17	142:4	133:15,17	20,22	132:2
151:16	15:23	143:6,25	159:21	117:2,18	month
153:3	17:3	145:9	167:2	118:5	155:11
member	18:14,15,	146:6	Metropoli	157:18	months
15:23	18 19:6,	147:12,	tan	minutes	19:13
members	8,11,14,	15,23,25	5:18,23	74:3 76:3	24:16
22:25	18,20	148:3,16	6:4 11:12	100:22	150:16
101:4	25:21	149:11,17	17:7	113:23	more
117:14	26:23	150:25	21:23	mission	9:14 25:6
125:8	27:4	151:5,8	46:24	88:8	27:2
memory	31:15	153:16,22	47:16,19	missions	43:21,23
11:6	32:18	154:7,12	52:23	22:4	44:22
99:17	35:4,11,	157:16,23	53:2,8	misspoken	49:17
mention	23 39:25	159:1,11	98:7	55:15	57:15,16
100:19	40:23	161:10,15	120:4	mistakes	59:14
102:12	42:5	165:16	121:1	148:3,8	60:7
mentioned	44:19	166:15,	170:21	mitigate	61:16
34:19,22,	46:11,18	22,25	MGM	113:8	63:8
25 41:22	47:6 49:4	168:5	19:13	mitigatin	83:20
60:5	51:13	169:7,17,	middle	g	92:19,20
74:23	53:10	20 170:1	167:16	131:4,10,	96:20
79:24	56:1,4,5	Metro's	military	12	112:10,19
82:6	57:19	30:6,24	19:16	Mm-hmm	128:11
105:22	59:13	32:8	Milton	119:25	132:22
106:19	66:9 73:1	43:18	15:25	model	135:22
144:10	75:24	44:6	16:2,5	68:16	138:12,19
mentionin	76:1	55:24	mimic	modified	145:16
g	77:20	56:14	64:25	49:19	148:8
116:21	79:2	66:2	65:3,22	138:18	149:13
mentions	84:15	70:16	mimicking	moment	151:4
37:12	85:6,20	72:17	65:4	133:6	162:5
100:12	86:5	76:21	mind	139:15	163:7
merely	87:2,25	82:16	104:16	momentari	more-
124:7	88:12	88:19,20,	161:23	ly	detailed
merit	91:6	20,23	minimal	159:13	100:20
128:13	96:13,25	94:7,8,14	84:11	money	morning
met	97:19	101:25	minimum	127:24	5:12 6:3
12:20	101:3	102:7,17	117:12		67:20
	104:8,21	103:8	minus		69:11
	106:5	110:4,18			80:23
	107:7,15	111:3			82:12
	110:19	113:2			122:18
	111:19,24	114:1			
	117:11,13				

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

143:2	40:16,22	108:1	96:20	70:14	169:21
150:23	43:12,17	110:21,	130:21	132:16	170:13
166:7,17	47:10	24,25	146:17	named	needed
167:9	48:9,12,	111:1,2	162:5	93:22	45:19
most	15,17	114:6,18,	multi-	124:18	57:25
78:20	49:6 50:4	24 116:3,	family	125:18	102:23
94:23	51:3,17,	10	166:8	132:1	149:14
116:1,15,	23 53:16	117:15,21	multiple	names	156:10
22 117:3	57:7,10	118:2	13:16	93:8	needs
138:16,17	58:20,24,	124:16	164:21	nanograms	10:1
157:18	25 59:10,	125:7	165:9	160:18	154:20
164:9	12,16,22	127:14,18	my	161:4	neighbori
165:16	60:2,4,6,	128:4,9,	5:21 7:3,	narcotics	ng
166:4	9,11,13,	14,22,23	5 8:1	20:20,21	55:7
mostly	18,21	129:6,8,	9:6,14	73:14	Nellis
22:17	62:17,21	11,15,18,	12:7 17:6	national	13:4
move	64:7,10	20,21,23	24:3	29:23	54:22
29:14	65:14,16,	130:3,4	25:23	30:15	55:10
133:25	23 67:1	131:21,24	27:10	47:13,14	106:3,13
moved	68:6	133:5,12	36:6	49:14	108:9,13
20:15,24,	71:9,20	134:8	53:21	134:21,24	120:6
25 73:21	72:7,9,12	144:1,12	74:7	naturally	166:9
74:17,18	75:13,16,	147:5,6,	81:14	63:3	Nevada
movement	22 76:23	16,21	87:25	nature	18:7,10
130:14	77:15	148:5,6,	91:3	7:17	19:11
movements	79:7,18	11	115:17	83:10	30:9,12,
44:13	80:6,14,	151:13,19	120:17	93:11	17 31:13
moving	21 81:7,	152:10,14	124:22	near	32:10
138:11	11 82:11	157:25	137:10	62:3	36:21
144:15	83:17	158:2,10,	144:13	necessari	42:17
Mr	84:1	11,24	168:19	ly	43:2 57:1
5:11	85:7,15	159:9,22	169:20	103:9	73:10
9:13,22	86:9,24	161:11,	170:6	143:3	114:8,10
10:11,15	87:5,11	19,24	myself	necessary	115:3,4,
12:1,25	90:16,19	164:17,24	23:17	44:7	7,14,21
13:14,20	92:2	165:1,7,	29:3,13	need	117:22
14:3,5,12	93:18,20	11,15,18,	N	8:4 30:6,	135:10
15:25	94:6,15	19 166:1	naked	9,12	157:17
16:1,5,	95:1,2,5,	168:24	143:2	75:10	never
19,20,22,	9 96:1,9,	170:5,7,	name	112:8	23:2
24 26:14	15,17,24	8,10,12,	5:13,14,	121:11	53:20
31:1,10	97:2,4,	15,16	21 15:23	145:16	76:1
32:12,15	13,16,21,	Ms	16:18	146:7	78:11
35:15,20,	25 98:5,	125:16	21:6 48:5	155:22	103:4
24 36:8,	14,16	126:4,21			116:2,11
16,22	99:24	129:14			130:20
	100:2	much			135:16
	103:19	32:10			
	106:9,17	57:15,16			
	107:17				

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

136:12,18 146:22 150:8,14, 21 161:20 new 28:15,16 29:6,7, 10,11 46:22 47:1,2 50:1,2 152:19 154:22,23 155:19 newer 73:5 next 49:2 58:10 70:13 92:15,18 113:19 NFDD 60:25 61:1 64:22 66:22 67:10 68:21 80:18 82:3 91:9 94:9 96:14 97:12 109:18, 19,21 110:14 113:3 157:24 158:5,13 NFDDS 60:24 61:21,24 66:3,14, 16 67:16 68:14 89:20,24	92:13,22 93:16 108:20, 22,25 109:1,5, 12 110:4 111:4,8, 20 112:1, 14 158:23 159:9,18 163:21 164:2 night 56:16 63:7,10 82:22 167:8 nine 64:15,16, 22,24 65:1,2 67:3 68:15,25 69:1,11, 20,23,25 70:8,14, 17,25 71:2,5,8, 13,15,19, 20,25 72:6 109:2 159:19 Ninth 33:25 93:5,10 141:23 146:21,24 147:3 no 6:9 8:6, 9,17 10:23 11:2 15:5,19 22:3 23:2 24:19 26:10	27:24 36:9,14 37:14 43:19 45:1 53:5,13 66:5 68:4 70:22 71:12 76:10 78:22 79:20,21 81:19 83:15 91:10,22 99:20 101:12, 14,24 102:10,12 103:24 104:9,24 105:11 108:6,17 113:7,22 114:2 122:4 126:3,19, 20 132:12,14 133:25 134:14 135:5,6, 16,20 136:16 137:3 138:11,23 139:2,8 140:14 144:8 149:17 151:7 152:11 153:18 154:14 156:1,9 157:4,14 159:3,12 160:12,20 161:5 165:21	167:1,22 168:1 170:3,18 no-knock 37:20,25 38:8,11, 20,23,24 48:8,11, 19,24 51:21 134:3,7, 10 135:3, 7,11,14, 16,22 136:2,10, 12,15,18, 21 137:1, 12 138:5 139:2,7, 10 155:16 no-knocks 77:2 nobody 44:14,16 91:25 92:8 94:20 noise 60:22 64:1,3,9 65:13 66:11 noises 44:12 64:6 none 59:5 nonverbal 8:11 noon 167:4 North 34:8 143:12	Northeast 19:23 Northwest 20:7 not 10:7,11 11:7,18 13:23,25 15:9,12 16:4,23 22:10,23 23:15,16, 17 25:10, 15 26:10, 16 27:2,4 28:9,20 31:7 34:4 35:5 36:1,7 37:25 38:13,23, 24 39:17 44:11,25 45:4 47:8 49:1,8 50:16,25 52:6 53:15,18 54:12 55:5 56:1,24 57:8,21 58:16 59:1,15, 20 60:7 62:11 63:10 65:1,7,21 67:9 70:21 72:24 73:9 74:7 75:7 79:3 83:23 84:13 85:3,13 86:7,15, 16,21 87:14,23	88:3 90:5 92:2,5 93:22,24 94:16 97:15 100:4 101:25 102:16,17 103:3,9 104:1,5, 6,14 106:6,10, 12,20 108:8,14 109:18 110:7,9 111:5,10, 23 112:2 114:22 118:1,7, 21 120:20 123:20 124:2,13, 14,23 125:9,16, 18 126:9 128:7 130:10 131:9 132:16 135:19 136:3,7 138:16,21 139:3,15 142:20 144:2,6, 14,20 145:10 147:2 149:1 150:4,12, 25 151:10 152:7 153:9,14, 24 154:3, 12 156:14,23 158:9 159:5 162:23
---	--	---	---	--	---

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

163:24	91:18	113:1	117:15	93:21	19 14:17
164:2	96:21	127:19,20	127:14	94:24	15:6,7
166:18	97:25	151:16,25	128:4,14	125:21	16:13
167:15	103:19	152:6	129:15	occupants	17:4,18
168:2,3,	113:13	153:3	147:5,16		18:2,3,5,
12 169:9,	118:15	O'Daniel's	148:6		7,15
17	123:10		151:13		19:10
note	124:15		152:10	39:11	20:1,19,
115:22	133:14	148:25	158:2	40:25	23,25
144:3	138:5,15	153:13	161:19	52:11	21:2,3,
noted	139:9,22,	oath	165:1,11,	58:10	20,22
151:3	24 147:8	6:15,17	19	78:17	22:6,13,
notes	155:12,16	objection	objection	82:1	20,24
91:3	168:6	9:13,23	s	91:14	23:4,12,
116:7	now-	10:7 31:1	9:15,21	109:3	21 24:3,
nothing	sergeant	32:12	10:15,18	111:6	13,24
76:10	54:2	35:15,24	obligated	112:18	26:11,13,
77:18,23	NRS	36:16	10:12	118:10	16,19,22
82:15	42:12,14	40:16	obligates	142:20	27:1,19
113:16	number	43:12	6:19	145:2	28:4,12,
146:9	57:21	47:10	observati	166:5	13,18
155:24	84:24	48:12	ons	167:17	29:3,6,8,
168:1	99:14,18	49:6	144:11,19	occupied	10,11,16
notice	105:9,16,	57:7	obstructi	93:13	31:6,14
11:22	22,24	58:24	ons	94:3	32:17
42:24	106:7,12,	59:16	90:9	occurred	33:4,9,
noticed	19	60:9,13	obtain	6:1 37:2	10,13,14,
75:13	107:14,	62:17	18:8	50:7	25 34:1,
notified	21,25	64:7	obvious	59:15,25	16 35:3
12:18	108:8,9	65:16	77:5	60:3 72:6	36:15,18
November	164:19	76:23	obviously	81:4	37:2,5,6,
20:12	165:3	79:7	15:2	89:12	8,18
now	numerous	80:14	59:19	98:18	38:19
14:14	12:22	81:7	79:13	124:17,20	39:5,7,
15:24	45:15	83:17	140:13	135:14	14,15,18,
20:17	47:15	85:7 86:9	occasion	141:6	24,25
24:10	163:9	87:5	22:12	165:8	40:5,19,
25:14,16,	O	90:16	27:10,18,	October	23,24
24 69:24	O'DANIEL	93:20	20	17:18	41:5,11,
70:11	13:1	94:15	occasions	of	13,14,19,
73:21	21:11,14	95:5	27:8	5:24,25	23 42:1,
86:5	25:23	96:17	occupant	6:1,4,15,	2,15,23,
87:2,3,25	54:11	97:4,21	57:22	17,18,20	24 43:7,
88:12	55:14,20	99:24	92:3	7:5,8,17,	24 44:5,
89:13	109:23	106:9		25 8:1,11	15,17,24
		107:17		9:1,14	45:1,10,
		110:21		11:3,10,	17,23
		114:18		13,20	46:9,15,
				12:2,3,8,	16 47:2,
				10 13:18,	7,13,17,

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

23,25	24 82:2,	115:2,3,	21,22	20,22	59:21
49:11,15,	6,12,21	17,21	143:1,2,	off	64:13,14,
21 50:5,	83:4,7,10	116:21	4,8,10,	14:6,8	20,21
7,15,19,	84:2,9,	117:14	11,14,20,	62:4,15,	69:10,12,
23,24	18,21,24	118:4,17,	21,22	23,24,25	13,15,17
51:4,20	85:4,19	21,22,23,	144:2,4,	63:16	70:5,7
52:5,6,7,	86:6,7,	25 119:3,	9,20,21,	68:22	83:7 84:6
8,17,21	13,19	5,8,9,10,	25 145:8,	69:8,25	91:24
53:23,24	88:3,6,	11,14,19	9,10,15,	70:10,22	94:18
54:8,22	14,16,23	120:4,10,	20,24,25	71:1,2	97:10
55:4,7,10	89:4,18,	12,14,15,	146:1,8,	74:13	113:16
56:9	24 90:1,	18 121:1,	12,15,19,	75:18	114:22
57:11,16,	6,13,17,	8,9,12,	20,21,23	79:21	160:6
25 58:2,	23 91:11,	13,15,17,	147:23	82:2 90:6	166:15
3,12	15,16,19	19,24	148:17,	93:7 96:4	officer's
59:6,7,14	92:12,24	122:11,	22,23,25	102:11	44:2
60:15	93:11,12,	12,17,18,	149:11,25	106:2	144:10,19
61:1,3,	24 94:2,	21 123:25	150:2,23	126:13	officers
16,22,24,	4,23	124:12,	151:1,5,	133:5,8	5:24
25 62:3,	95:3,6,	17,22,24	8,10,20	144:21	14:18
12 63:16,	14,19,20,	125:1,8,	152:11,	147:8	28:1,9
23 64:17	22,23,25	10,14,15,	12,13,20,	157:21	30:23
65:2,6	96:4,9,	21 126:8	23,25	159:18	32:18
66:3,6,	11,15	127:1,3,	153:13,19	170:23	33:15
15,19	97:23	7,10,11,	154:4,5,	offenders	34:18
67:5,13,	98:9,21	24 128:6,	21,22,25	20:17	35:12
20,23	99:2,7,8,	7,24	155:14,	offered	39:5,9
68:5,13,	12,17	129:11,19	19,22	151:16	40:4,6,25
17 69:23	100:1,8,	130:2,5,	156:19,23	153:11	41:6 43:3
70:1,8,	11,17,18,	9,13,14,	157:11,	offhand	46:8
12,21,23	22 101:9	22 131:5,	21,22	34:4	47:14
71:24	102:5,12	18,25	158:5,12,	147:8	48:1
72:5,6,	103:22	132:20,	20	office	52:10
17,24	104:3,4,	21,22,23	159:12,23	12:21	57:23
73:9,11,	17,18	133:1,18,	160:19,23	officer	58:9
12,16	105:1,13,	23,24	161:3	13:2,17	59:11
74:5,14,	24,25	134:5,13,	162:1,22,	14:23	66:8 67:2
16,22,25	106:3	15,19,24	23 163:1	18:23	68:7
75:24	108:9,16,	135:2,3,	164:6,8,	19:23	71:16
76:7,11,	20,24	18,22,23	9,12,14,	20:6,7	72:15
13,16,18,	109:15,	136:1,16,	16 165:3	23:13	74:4 75:1
20 77:5,	18,19,21	20,24,25	166:3,14,	24:8	76:3
12,20,22	110:3,8	137:6,14,	16,22	25:9,17	78:16,21
78:7,14	111:4,7,	17 138:1,	167:6,7,	27:17	82:11,17
79:2,5,	8,12,20,	13,17,21	12,16,17,	38:7 41:8	83:13,15,
10,24,25	25 112:3,	139:5,7	20 168:8,	42:21,25	20 84:2,
80:3,11,	8,19	140:4,8,	10,15	44:7	17 91:22
23,24,25	113:5,17	11 141:24	169:17,21		99:4
81:1,3,5,	114:15,	142:10,	170:3,6,		101:13
9,10,18,	16,23	11,14,15,	10,12,13,		

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

103:21	11:17,20	76:13,16	129:6,7	56:13	79:12
104:22	12:2,20	77:2,11,	130:8,15	57:21	ones
113:23	13:12	13,20	132:2	62:3	12:4 15:1
114:9,16	14:11,14	78:12,13,	133:11,13	74:22,23	141:21
115:14	15:6,7,10	14 79:9,	134:17	76:21,25	only
116:3,10,	16:9,11	11,22	137:6,10,	77:2,8,21	28:9
16 117:7,	17:6,18	80:2,23	19 138:4,	78:2,11	48:10,19,
14,24	18:15	81:6	20 139:20	79:2,6,	24 56:2
118:16	19:14	82:11,16,	140:11,15	14,16,24	57:22
128:2,25	22:4,8,	20,22	145:13	80:12	77:9
136:24	12,13	83:7,22,	146:11,13	83:23	79:16
139:13	23:7,14,	23,24	148:4	84:8 90:4	84:17
140:6	16,19,24	84:2,6	150:2,6,	98:12,13,	98:23
141:25	24:8,10,	85:10	8,22	17 103:24	100:7,10,
142:8,16	21 25:9,	86:3,12,	151:24	107:2	25 106:19
144:22	18 28:16	16 87:9,	152:1,18	109:1,20	126:24
146:7	32:19	14,19	153:1	115:25	129:12
154:3	34:15	88:8,15,	157:12,25	116:14,	131:3
158:1,25	35:12,13,	21 90:24	159:19,	19,22	134:3
159:3,6,	18 36:14,	91:21	20,22	117:2,18	138:5
10,15	24 39:17	92:15	160:13,14	118:4	139:10
161:14	40:13	93:3	161:4,14,	125:25	158:4
162:7	45:14	94:2,11	18 162:2,	127:3,7	163:24
163:4,23	46:16	95:3,7	3,16,17	129:11	onset
164:4,5,	47:16	97:8	164:8,11,	132:2	118:25
25	48:3,5,	99:1,4,6	12,14	134:16	open
165:14,	10,19,25	101:23	165:10,	144:9,14	42:22
23,24	49:1 51:3	102:24	20,24	150:10	44:21
officers'	52:7	103:4	168:12	152:13	45:2
40:2	54:7,13,	104:1,17,	169:8,18,	156:16	54:22
official	18 55:4,	25 105:8	24 170:3	157:17	55:9
88:23	11,16,17,	108:23	once	158:12	67:14
94:8	19 56:7,	109:2,11,	45:19	162:2	77:6
101:25	8,9,10,18	14 110:5,	52:18	164:2	117:3
103:8	58:6	16 111:6,	58:7	170:16	opened
166:25	59:24	8,15,22	59:9,23	one-	45:20,21
officiall	60:18	112:2,3,	67:14	bedroom	67:9
y	61:3,18,	14 113:5,	70:8 77:3	54:25	opening
18:2	19 64:12	17 114:2,	91:16	one-	44:11,15
older	66:20,22,	8,17	one	minute	45:4
149:7	24 67:10,	115:7,8,	7:13,19	116:11	66:15
on	23 69:23,	14,24	9:1,14	one-on-	operation
6:1,4,14	24 70:11,	116:7,11	22:24	one	93:19
7:18	19,23,24	117:10,17	34:1 37:8	one-	103:23
8:13,18	71:22	118:3,20	38:19	second	
9:17,20,	72:8	119:11,	39:14,18,	77:10	
24 10:3	73:25	15,23	23 40:23		
	74:10,11,	121:19	41:21		
	14 75:11,	124:16,24	52:12		
	12,21,24	128:19			

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

operation	140:25	ought	106:14	overpress	page
s	141:19	143:17	107:21,	ure	6:14 12:2
61:20	order	our	23,24	63:22	115:22
operator	135:10	13:12	108:2	92:19,20	116:7
22:10	organizat	28:12	120:2	96:20	119:24
23:2	ion	30:22	121:19	oversee	155:21
operators	30:20	34:20	123:7	28:2	pages
28:7,8,12	originate	38:13	124:4	oversees	98:21
86:20	d	40:19	134:24	30:22	168:25
118:6	116:24	48:25	139:20	overturn	169:9,18
140:20	other	52:18	141:15	87:13	pandering
145:14	7:6 10:10	54:15	143:4,14	overtur	27:21
opinion	13:13	59:3 61:3	145:23	ne	paragraph
32:9	14:15	65:21	155:22	d	116:4
50:16	15:18,19	69:24	166:11	87:8	part
76:21	18:23	75:8	168:17	overwhelm	22:13
opportuni	23:1	78:14	out-loud	45:22	26:22
ty	37:20,25	90:12	8:5	overwhelm	28:4,24
102:25	47:19	102:24	outer	ing	29:16
163:2	62:23	107:21,22	42:22	46:2,4,7	42:23
opposed	63:19	114:19	outside	48:7	104:4
7:16 8:6	73:3,6	115:11	67:4	49:21	152:11,20
85:20	74:22	117:16	85:20,23	50:25	158:20
163:8	92:2 95:3	119:11	90:7,11	51:2,20	163:1
opposite	99:2,12	138:17	93:3	57:18	particula
10:8	100:19	140:5	109:19	58:6,8	r
22:20	123:3	141:19	118:6	61:13	32:19
option	124:8	162:16	119:4	133:23	38:23
54:4,5	130:21	163:25	159:6,20	162:21	64:11
56:20,22,	131:4	166:12	outstandi	overwhelm	74:11
23 57:6	132:4	169:25	ng	ingly	81:24
61:2	138:6,11	out	132:6,7	56:17	103:19,23
66:15	139:6,19	8:18	over	own	109:11
108:25	142:11	23:21	14:20	84:15	123:23
122:20	143:22	27:14	18:2	107:11	124:5
133:25	144:11,19	44:10	21:2,5,19	110:20	133:16
139:13,	145:7	45:5	27:15	111:4,20	155:24
16,18,23	150:14	49:18	57:19	117:14	168:17
140:1,17,	151:17	52:1,16	73:12	122:17	partners
23	155:17,24	53:4,11,	93:25		144:13
options	162:3,15	15,18	154:18	P	parts
38:17	167:14	55:6,12,	overhaul		36:19
54:1,3	others	17 59:22	155:20	p.m.	pass
58:13,17	28:22	61:8	overlay	133:8,11	11:23
109:15	otherwise	67:21	56:9	170:23,24	past
139:6,19	10:14	80:7			
	128:18	83:8,14			
		86:21			

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

13:8 24:1	per	14:17	physical	59:7	46:24
patches	145:9	15:5	y	70:11	47:17,19
162:10,15	160:18	16:13	94:9	79:14	48:25
163:23	perceive	personall	102:10	81:24	52:23
patrol	161:17	y	113:3	95:20	53:2,8
19:21,23	percent	16:8,10	129:10	99:6	60:6 61:9
20:6	35:7	21:21	164:7	100:9,17	65:10
23:24	perform	28:18	pictures	101:9	66:8
25:13,14	118:16	persons	168:15	104:1,12,	107:4
pattern	performed	39:25	piece	18 111:7	120:5,6
142:22	72:15	115:10	29:8,10,	122:21	121:2
pause	101:21	168:10	11	146:7	126:5
61:12	103:10,14	pertained	pieces	148:18	137:11
PC	105:8	50:10	154:22	151:24	143:17
22:18	106:8,11	Peterson	pin	152:3,5	145:19,
peace	138:10	134:1	69:5,7	plans	22,23
114:8	156:6	phase	pistol-	28:14,15	150:21
116:16	period	59:7	rated	37:7	159:17
117:24	24:24	104:18	84:12	53:25	160:6
peeking	46:21	phases	place	59:3 75:9	163:13
145:21	116:15	81:24	22:21	109:13	164:3,17
penalty	145:8	phone	47:6,12	115:18	170:21
6:20	157:18	12:22	plaintiff	played	Police's
people	perjury	photograp	84:23	6:24	98:7
8:14 9:4	6:20	hic	plan	please	policies
65:3,12	permanent	99:17	59:1	5:13 8:1	30:2,6,24
66:1,7	ly	photos	67:6,11,	9:7 52:24	32:4,5,6,
78:20	127:4	95:23	20,25	53:3	8 72:14,
82:13	permissib	phrase	69:20,23	point	18 76:2
85:19	le	31:11	70:12,13,	60:15,17	88:23
92:5	113:6	43:3	16,23	78:23	90:12
94:10	person	105:25	80:15	131:7	101:16
108:14	66:12	106:3	83:22	141:9	107:11
109:10	92:13,14,	139:8	99:6	156:16,20	111:4,21
112:8	18,22	phrasing	103:16	police	113:7
123:8	123:25	82:8	122:1,10	5:18,23	122:23
127:11	124:10	physical	146:15	6:4	130:6,25
141:13,15	150:6	101:22	planned	11:12,16,	133:15,17
142:14,25	163:1,15,	102:1,8,	80:11	20 14:17	134:6
143:2,17	18,20	12,23	104:1	15:21	152:13
158:14	person's	104:25	119:17	16:9,10,	154:23
160:7,9,	63:1	105:2,10	planning	16 17:7	157:12
14 162:16	personal	150:1	15:6	18:22	policing
163:11	12:20		32:21,22	19:16	47:22
166:17			37:4 54:8	21:23	policy
				33:11	13:11,12
				39:19	34:20
					47:6,8

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

48:14,18, 25 49:1 50:8,18 74:3 75:1 81:20,21 86:12,18 87:10 89:2,20, 23 90:2 92:21 97:3,20 101:19,25 102:2,7, 10,17,24 103:8 104:21 105:6 107:16 108:19,22 110:22 111:14 112:3,9, 14 113:18,22 114:20 120:23 123:12 129:13 132:17, 20,23 133:22 134:2 135:18 138:4,6 141:18 148:17 149:1 153:15,25 166:25 167:2 169:25 170:4 portion 98:9 100:18 102:18 154:5 position 33:14	43:18 44:6 45:3 49:3 51:14 55:24 56:14 66:2 82:16,20 87:3 88:19,20 94:8,14 96:3 110:4,12, 13,18 111:3 113:3 114:1 118:20,24 120:9 121:5 152:18,19 157:23 159:21 161:10,16 169:8 positioni ng 94:4 159:6 positions 18:23 162:16 possible 132:8 143:22 possibly 52:14 83:9 post 30:17,25 31:5,14, 22 32:6, 10 114:10, 22,23 115:4,7, 8,14,21	117:8,23 118:3 138:16 157:17 POST's 32:4 114:16 post- incident 133:15 potential ly 92:14 146:13 powder 63:24 92:17 Powerpoin t 99:6 Powerpoin ts 152:24 153:6 practical 43:19 137:1 practice 81:22 101:19 105:6 108:19 113:22 123:12 practices 15:21 16:16 130:6 pre- policies 138:15 predomina tely	61:3 preferred 55:25 56:15 premises 80:24 prep 72:22 prepare 12:14 prepared 159:8 preparing 13:21 preplan 121:23 preplanne d 68:4 80:6 104:8 121:18 preplanni ng 108:20 128:7 144:25 146:12 prescript ion 10:25 presence 38:14 39:10,19 40:19 46:10 163:25 164:1 present 11:14 53:25 79:16 presented 11:20	41:14 54:6,9 58:1 74:10,15, 17 77:4, 12 78:3 press 166:14,20 pressure 63:17 presurvei llance 110:10 111:16,23 pretty 27:8 146:17 168:16 previous 14:19 36:7 previousl y 139:18 principle s 89:21 99:4 105:1 153:21 156:5 163:1 prior 12:7 13:9 18:24 21:4,10 22:5 23:17 34:14 35:1,3,8, 22 37:14, 15 38:14 39:8,12 40:19 45:18	58:13 67:8 69:16 70:13 71:25 73:11,22, 24 74:19 76:8 77:12 78:1 79:24 80:19 88:10,22 89:13,19 92:6 98:12 99:10 101:17 104:2 106:24 110:8 115:13, 16,19 119:18 121:14 122:12,13 124:15 126:10 127:9 129:12 130:10,12 131:19 135:25 138:15 145:16 146:18 149:8 154:17 156:11 165:4,22 priors 55:3 privilege 10:10 probable 139:21 probably 12:21
--	--	---	--	---	---

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

22:12	57:9	101:3	put		really
73:4	projected	118:18	7:8 79:11	R	112:14
78:20	78:5	125:11	116:23		135:17
98:21	promoted	163:5	134:17	raid	137:15
103:21	20:12,22	168:20	141:18	80:16	155:18
139:1	22:5	provided	154:10	88:8	162:22
144:5	23:20	34:17	157:20	range	167:6
160:13	24:9	101:12	putting	55:1	rear
problem	25:12	116:2	43:24	rank	67:21
142:24	26:19	proximity	130:15	17:5,6	reason
procedura	propel	41:17		rather	6:2 8:10
l	90:9	PSI	Q	120:2	9:23
90:2,12	proper	92:20	question	rationale	10:11
procedure	144:5	96:12	9:6,22	40:14	15:24
11:10	properly	97:8	10:9	react	16:17
75:1	107:8	public	12:6,7	161:17	51:14
procedure	110:5,7	117:14	49:2	read	104:14
s	126:9	126:25	53:19	13:3	145:18
72:18	140:18	166:15	87:25	26:15	162:19
101:16	property	publish	90:25	42:21	166:2
122:24	33:11	31:14	91:5	87:16	reasonabl
130:6,25	52:8	published	101:7	101:5,13	e
proceed	105:13	30:21	108:2	107:3	33:13
6:13	106:2	publishes	115:9	114:22	39:25
process	130:23	31:23	120:21	127:5	40:4
8:15 9:16	131:3	purpose	123:16	147:9	41:5,9
54:8	property-	34:14	128:10	153:6	44:24
128:16	only	39:10,20	148:13	156:12,24	46:9
133:4	131:1,8,	40:2	166:13	169:13,15	49:22
135:21	9,22	42:25	169:20	reading	58:12
146:19	132:12	76:14	questions	53:21,22	66:7
163:6	protect	102:6,14	7:5,8 8:1	64:18	76:15,22
produced	47:25	103:6	9:14	69:22	78:24
13:23	52:10	105:4	170:6	124:22	79:3,17
15:17,22	protected	107:22,23	quick	128:17	82:17
16:16	10:10	119:9	62:12	134:18	86:7,15
98:8,22	protectio	122:12	137:15	148:20	93:12
114:10	n	165:6	quickly	152:21	100:23
profile	43:11	purposes	59:21	167:25	115:23
46:21	prove	61:6	quote	realize	118:17
program	136:17	pursuant	42:21	18:21	120:10,14
20:17	provide	11:9	43:1	46:18	121:13
progressi	32:18	pursuit	93:10,14	realized	122:6
ons	84:11,14	27:13		47:7	125:10,14
					141:25
					143:13
					144:2
					145:10

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

146:5	128:17	87:8	156:16	152:1	148:21
147:2,4	136:22	97:23	reference	regurgita	151:1,6,9
154:4	147:9	recommend	d	te	154:10,11
156:18	158:18	ed	130:1	39:6	159:24
reasonabl	160:18	96:10	168:2	reinstitu	160:21,
eness	161:7	97:6	referred	ted	23,25
34:16	164:10,19	recon	99:19	107:6	161:9,21
41:11	166:19	56:9	referring	related	169:1,3
42:1	receive	record	109:22	13:4	reporter
46:16	19:19	7:24 8:19	refers	131:25	5:14 6:16
50:19	received	9:24	112:16	154:2	7:3 8:19
74:13,14	26:13	10:16	116:23	relating	9:3
75:11	129:1	14:6,8,	reflectiv	27:23	reports
76:18,20	152:25	11,14	e	relations	13:7
78:12,13	recently	75:18,21	162:15	166:15	15:16,18,
83:6	35:2	86:3	refocus	relay	19,22
85:13	160:2,8	87:19	63:5	157:16	16:3
86:13	recess	114:7	refusal	reliable	26:15
87:14	14:9	129:18	43:7	30:20	53:22,23
88:6	75:19	133:5,8,	44:17	relook	64:18
117:2	133:9	11,14	refused	86:2	88:21
119:14	recognize	170:23	42:25	remember	95:8
121:9	24:5 25:2	recorded	43:3	15:1	124:22
133:24	26:5	70:22	44:2,4,5,	27:10	165:21
137:6,14	163:12	records	8,9	143:9	167:25
138:13	recognize	recovery	regarding	160:25	request
143:20	d	131:25	6:13	170:17	11:18
148:23	recollect	recreatio	12:23	remembere	44:15
157:22	ion	nal	13:7	d	requested
reasonabl	81:14	160:3	14:21	27:7	38:8
y	156:23	reduce	30:2	removed	136:4
40:10,11	recommend	40:24	53:16	69:5	requests
163:3	ation	166:9	72:14	repeat	99:12
reasoning	31:15	refer	75:25	8:2 20:17	require
54:12	53:23	155:8,11	130:24	rephrase	31:5
reasons	85:11	160:20	131:20	8:2	32:10
9:1 40:24	97:17,20	reference	133:17	report	39:5
53:14	111:22	12:24	148:18	12:24	required
158:13	recommend	27:11	155:15	16:22	30:24
recall	ations	64:21	regards	49:25	40:6 42:6
34:23	46:25	74:21	32:22	74:22	requireme
69:22	47:1 48:3	99:13	52:14	110:20	nt
71:3,22	51:19	138:8	regular	128:17	31:15,17
87:17	85:10	147:11	37:21		33:21
105:18,21					42:8 43:7
106:18					44:17
115:16					

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

93:15 114:23 requirements 32:20 39:15,18, 24 50:12 90:15 requires 42:20 46:6,8 57:2 66:25 requiring 40:14 rescues 162:12 research 36:6 74:7 115:17 resemble 65:11 resembled 64:3 65:14 reserved 139:10 155:16 residence 13:5 22:21,23 40:1,8 41:1 52:15,24 53:9 57:22 58:10 61:11 74:6 76:5 77:8,19, 23 78:23 91:8 105:11,12 111:18 113:25	119:20 122:14 124:3 125:22,23 131:21 132:4,10 142:2 149:6,8 150:3 158:14 163:2 168:5 resident 53:3 resolved 127:23 respect 35:22 58:19 respond 10:8,12 response 8:5 9:9, 25 10:4, 17 162:21 responses 8:11,12 81:19 responsib le 28:11 restate 91:5 restricti ve 43:21,23 result 21:22 26:13 47:7 60:8 126:22 130:5 resulted 60:4	129:14 retained 158:22 retire 21:17 24:20 retired 21:9,15 24:16 25:24 retrainin g 26:13 revamp 155:18 review 7:10 13:22 29:17 50:20 51:7,15 71:11 84:15,16 86:11 87:13,17, 18 88:4, 17 95:22 98:19 99:8 110:7 144:3 154:19 160:22 169:6 reviewed 12:8,15, 24,25 13:7,8, 11,15,19 15:16 16:3,22 51:7 85:16 98:12 109:25 133:20	reviewing 14:15 35:8 49:13 70:12 95:8 104:17 111:6 reviews 103:17 revised 89:3,4,6 154:15 revisions 89:11 rhythm 65:6 rhythmic 65:2 ride 22:7 right 7:4,10,18 15:24 21:15 26:20 29:18 30:10,13 33:18,22 44:18,21 48:5 63:14,17 64:1,25 65:24 71:14 83:14 84:4 87:12 90:6 92:5,22 95:3,4 102:16 112:15 117:7 121:17,20 122:19	125:20 126:6 127:12,19 131:23 135:11 137:18,23 139:15 143:16,18 145:25 147:8 149:18 150:12,23 151:22 155:12 159:18 160:15 162:21 163:16 164:14,21 165:10 rights 96:16,19 128:3,12 risk 40:24 83:15 122:25 123:1,14, 20 124:6, 9 166:10 rocks 90:9 role 151:21,24 152:12 rolled 27:15 room 7:7 24:5 45:22 62:24 93:13 94:10 113:10 Roth 13:3	Rothenbur g 25:8,9 64:13,20 84:6 roughly 68:21 round 71:21 rule 8:24 9:20 11:9,11 39:2,5,15 40:15,24 41:7 42:18 43:10,20 46:8,13 47:5 49:5,10 53:12 66:4,25 74:24 76:5 85:5 86:8 87:23 99:23 102:15 125:9 127:11 rules 6:11 72:18 ruling 10:2 running 115:2 rural 41:15 Russ 13:2,17 14:23 25:3 54:7,9 55:21 104:6
--	---	--	---	---	---

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

107:20,24 111:10 Russell 24:15,16, 19	safety 57:21 58:20,22 82:1 83:7,21 84:11 112:15 167:6	60:1 81:15 107:6 113:6 119:23 127:11 138:14 150:20 159:8,17	158:9 160:17 165:12,22 saying 9:4 32:11 48:4 56:1 78:1 81:18 86:3 87:2,19, 21 113:2, 21 118:3 120:22 122:15 136:7 152:18 159:16	search 13:3,12 22:8,20, 21 32:21, 23 33:15 35:19 36:20 37:4 38:4,5,7, 8,10,11, 15,18 39:21 40:21 42:15 45:1,11, 12,18,23 46:22 48:8,22, 24 49:11, 17 51:21 52:5,24 53:3,9 58:18 59:2 61:4,19 72:21,22, 25 73:12, 15,16 74:11,12 75:12 76:16,19 79:11,13 80:3 81:24 93:23 99:7 100:8,17 101:9 105:14 107:5 108:10, 13,20,23 109:6,11, 15 119:10 120:7 124:24 131:1,8, 10,20,22, 24 132:12,15	134:3,7, 13,18 135:7,21, 22,24 136:2,19 137:11 138:17 139:2 140:4,12 142:10 143:12 145:1 146:12 148:10 154:25 156:8 159:17 162:13 163:9,14 167:13, 21,23 second 15:14 17:10 27:18,20 61:12,15 62:8,9,20 63:8 67:23 68:1 69:9,18 76:21,25 77:2,8,21 78:2,11 79:6,14, 17 80:8, 12 82:24 105:19,25 106:19,24 107:1 108:3,4 121:17, 19,24 122:19,22 126:10 129:2 seconds 68:9 74:3 75:2,5,6,
S	said 7:4,19 20:4 24:2 49:20 55:9,16 64:19,20 65:25 70:5 85:10 103:5 105:24 106:1,3 107:5 108:13 110:7 120:11 121:22 129:19 133:21 136:16 137:11 139:25 144:22 148:23,25 149:13 150:7 156:17 166:16	satisfied 104:4 satisfy 103:7 104:19 106:15 saw 64:12 144:15 say 7:13 8:15 15:4 16:14 17:21 18:20 22:17 29:14 32:7 35:25 38:11 49:24 53:6,20, 24 59:21 62:6 64:4,5 71:2 73:5 77:9 79:12 82:6 87:6 92:16 110:10 112:6 118:14 120:22,25 121:2 137:2 138:17 145:22 154:17	says 11:11 31:5 33:20 42:21 52:17,22 68:24 70:14 102:10 115:5,7, 25 116:14 117:3 118:15 121:11 162:3 scenario 77:17 165:17 school 19:1,4 28:13 151:15 153:10 167:11 scrutiniz e 59:3 se 145:9	search 13:3,12 22:8,20, 21 32:21, 23 33:15 35:19 36:20 37:4 38:4,5,7, 8,10,11, 15,18 39:21 40:21 42:15 45:1,11, 12,18,23 46:22 48:8,22, 24 49:11, 17 51:21 52:5,24 53:3,9 58:18 59:2 61:4,19 72:21,22, 25 73:12, 15,16 74:11,12 75:12 76:16,19 79:11,13 80:3 81:24 93:23 99:7 100:8,17 101:9 105:14 107:5 108:10, 13,20,23 109:6,11, 15 119:10 120:7 124:24 131:1,8, 10,20,22, 24 132:12,15	134:3,7, 13,18 135:7,21, 22,24 136:2,19 137:11 138:17 139:2 140:4,12 142:10 143:12 145:1 146:12 148:10 154:25 156:8 159:17 162:13 163:9,14 167:13, 21,23 second 15:14 17:10 27:18,20 61:12,15 62:8,9,20 63:8 67:23 68:1 69:9,18 76:21,25 77:2,8,21 78:2,11 79:6,14, 17 80:8, 12 82:24 105:19,25 106:19,24 107:1 108:3,4 121:17, 19,24 122:19,22 126:10 129:2 seconds 68:9 74:3 75:2,5,6,
SACO 51:24 52:1,4 54:13 55:25 56:1,12, 18,20 57:18,20 58:17 59:14,19, 24 60:7, 16 78:15 83:18 137:5 138:9,18, 19,24 139:1,12 140:20 141:1,20	SACOS 138:8	safe 20:20 45:23 58:9 59:8 84:13 95:12 103:2 112:8 116:1,15 157:18	sale 149:25 sales 167:18 same 6:14,17 8:25 9:1, 4 17:24 43:9,15 48:23 50:21 58:16	SACOS 138:8	safe 20:20 45:23 58:9 59:8 84:13 95:12 103:2 112:8 116:1,15 157:18
safely 52:11,13 139:14 140:6,20	safest 78:16 117:13				

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

7,10 76:3	32:16	162:24	145:19	127:25	165:8
79:1,6,22	46:14	168:14,15	166:23	settlemen	short
81:9	69:7	sees	167:3,21	t	60:24
82:25	77:3,4,14	77:6	served	127:23	shorter
84:17,24	81:14	seize	19:1	several	144:20
85:2	82:14	132:16	37:19	5:24 6:11	145:25
86:13,23	92:5,8,10	senior	39:1	7:24	146:1,22
88:10	94:22	28:8	41:1,23	26:19	157:7
100:22	95:23	sense	138:22,	41:10	shot
113:23	97:11	38:4	24,25	84:2 89:8	58:21
117:19	99:9	110:25	141:24	130:8	60:6
120:19,24	113:11	151:10	142:25	164:12	shots
121:3	126:5	158:16	148:4	166:6	71:17,20
126:12	136:6	sentence	149:16	168:25	72:1
144:1,4,	144:23	9:7	157:13,15	severely	show
24 145:8	145:14,20	separate	166:16	125:3	8:12
146:6,23,	149:2	58:17	service	severity	81:16
25 147:2,	153:6	sergeant	42:15	134:15	shower
4,13,14,	154:19	13:2,17	45:1,11,	sexual	143:11,14
17,20	157:25	14:24	23 49:11	124:25	shown
156:18	158:24	20:13,14,	52:5	shadowing	28:9
169:6	159:4,5	15,18	73:12,16	22:7,9	sic
section	162:6	22:16	80:3 99:7	shake	126:8
17:8	164:24	24:9,17	100:16	8:16	side
20:11,15,	seeing	25:3,13,	101:9	shaking	8:7
18,20,24	160:25	14 28:6,	109:15	8:6	54:18,21
21:1	161:7	21 105:19	123:13	sheriff	66:22
28:4,5	seeking	109:25	124:24	47:1 50:2	83:23
29:5	142:20	110:2,3	133:18	shield	95:3
42:13	seem	111:10	136:16	84:5	109:2
56:6	57:14	120:4	140:4	shields	159:20
100:16	seems	121:1	142:10	84:4,10,	162:17
114:23	27:7	129:4,9,	145:15	13	sides
116:7	122:2	17,19,22,	148:9	shining	52:13
124:23	156:15	24,25	154:6	164:17	54:17
135:23	seen	151:10	166:3	shoot	82:12
152:13,21	9:17	152:1,7	serving	59:10	sign
154:19	56:8,9	156:12,15	33:17	shooting	77:5
160:23	70:12,23	serve	38:10,15,	5:25	signed
sections	77:19,23	11:13	18 100:9	116:3,10	38:5
73:13,14	91:18	39:20	101:21	132:7,8	significa
security	98:9	73:13,15	143:12	133:19	nt
19:13	103:20	136:21	167:3,7	150:19,23	127:6
see	114:12	137:9	set		
9:19 23:9	150:8,15	139:14,22	11:9 67:5		
24:11	152:9,16,	142:2	71:2		
28:16	23 161:25		settled		
29:6					

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

significa	situation	slow	81:18	118:5	148:22
ntly	61:18	121:2	113:20	something	156:15
126:21	66:19	small	114:7,21	7:17 8:18	161:4
similar	117:17	54:19,24	117:6,17,	14:21	sort
64:9	situation	82:12	19 123:3	29:12	11:3
128:21	s	90:9	129:13	44:22	26:13
166:14	61:4	112:12	130:22	47:24	31:14
simply	117:18,19	smaller	133:14,	52:23	50:5
44:14	six	136:23	16,21	95:24	135:18
52:16	68:9	smell	135:9	98:1 99:2	137:17
91:8	72:10	160:14	139:5	113:9,13	sought
138:24	82:25	SMES	140:18	142:22	134:7
139:14	84:17,24	85:12	141:2	156:17	167:22
simultane	85:2	smoke	143:2	sometime	sounded
ously	86:13,23	69:6	146:6	21:18	65:10
81:4	88:10	smoked	147:9	sometimes	sounds
since	117:19	160:7,10	149:4	6:12 10:6	19:3
18:18	143:25	smoking	150:16	58:1	65:24
25:3 29:1	144:4,24	160:1	151:17	60:23	66:11
133:19	147:14,17	solely	153:4,6,8	135:25	69:2
154:21	six-	85:19	156:19	somewhat	South
157:13,15	second	solidifie	somebody	151:20	108:13
single	86:15	d	23:25	somewhere	120:5
37:5	size	130:10	24:4,11,	55:1 79:1	Southern
79:11	41:13	some	23 25:1,	son	18:7
105:12	45:14	9:23	20 26:1	5:25	19:10
114:22	52:8	10:9,10	44:20	sorry	speak
singular	81:25	15:24	45:2	13:15	11:15
74:9	140:11	16:17	46:10	14:4	22:25
sir	skip	23:4	61:11	22:15	36:2
5:12,17	36:23	30:15	64:19	23:20	speaking
157:4	37:16	31:14	67:17	37:8	8:24,25
siren	slang	32:22,25	77:5,6	43:25	9:8 30:1
65:10	8:8,12	33:24	114:15	55:18	35:10
sit	sleep	41:19	116:17	60:13	54:2
37:1	143:2	51:14	118:18	62:2	special
83:13	sleeping	52:7	119:3,5	72:3,24	11:10
site	95:3	54:19	123:10	75:6	specific
80:6	96:2,6	61:22,25	125:10	79:20	33:1
sits	slide	63:16,22	133:3	90:25	34:16
48:21	72:10	64:19	145:21	91:1	76:7
sitting	slight	65:3,25	somebody'	116:6	80:16
96:6	61:15	72:5	s	121:25	82:21
101:11	63:22	73:3,12	someone	122:1	99:13,18
		74:21	23:9	123:4	100:11
			117:24	129:20	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

108:17	Spencer	32:17	73:10	150:8	still
116:21	16:19, 21	114:9, 21	74:1 75:9	staying	9:24 21:7
121:10	spindle	117:13	78:13	124:3	23:7, 14,
144:12	69:8	standing	79:23	133:1	19 24:8
146:11	spirit	44:20	86:18	134:9	25:9, 18
147:1	138:1	114:9	88:9	stealth	44:23
156:9, 10	split	133:3	102:11, 21	162:12	49:9
specifica	61:12	standpoin	105:13	167:13	58:15
lly	spoke	t	114:20	stealthy	59:25
11:18	52:7	111:25	115:3	162:24	60:19
26:8	155:15	staring	116:21	stemmed	65:11
34:19, 22,	spoken	165:9, 13	121:8	124:25	67:17
24 35:5	12:16	166:11	128:11	stepmothe	68:9
37:12	14:22	start	143:2	r	83:2, 5
38:8, 16	16:24	52:18	146:10	150:7, 16	85:12
50:10	24:1	72:20, 21,	151:14	168:11	87:8
75:9	113:20	23 73:8	157:22	stick	96:10, 22
82:10	spot	78:18	stated	65:1	102:13
102:3, 21	24:18	109:13	8:18	66:21	106:11
109:22	Springs	119:11	15:19	67:13, 22	108:6
133:22	27:14	120:10,	50:17	68:2, 6,	112:13
142:7	squad	15, 25	88:18	15, 18	117:5
158:18	23:24	121:11, 14	106:24	69:14, 17	120:20
speculate	28:5	146:19	111:5	70:8, 18	121:9
60:18	square	169:10	146:22	80:8, 18,	123:24
speculati	54:25	started	153:3	25 81:3	132:9
ng	stage	19:10, 20	158:12	83:1	137:13
152:16	146:7	20:5 22:6	159:25	84:7, 22	138:14
Speculati	stand	49:14	statement	88:11	156:7
on	88:1	83:1	s	91:14, 19,	Street
59:17	standard	Starting	states	21, 25	20:21
60:10, 14	31:6	22:6	18:25	94:3, 11,	160:14
62:18	47:14	starts	19:12	18 95:18	structure
speed	115:6	119:1	30:7 33:4	112:20	41:13, 18
46:4, 6	116:11, 13	state	34:1, 6,	113:6, 17	43:15
48:6	117:8	5:13 9:24	21, 24	119:19	45:21, 22
49:21	standardi	10:15	35:5	121:15	46:2 58:7
50:24	zation	29:23	37:10, 12	122:13, 21	81:25
51:1, 20	31:7	30:10, 12,	42:7	145:5	90:4
57:17	standards	16 31:8	115:22	147:18, 25	91:12
58:5, 7	29:20, 22,	32:23	stationed	149:1	92:3, 10
133:23	23, 24	36:21	19:22	153:13, 14	93:22, 25
144:24	30:16, 20	42:17	stay	159:2	94:3
spell		43:2, 7,	110:12	sticks	97:24
5:14		19, 21	stayed	104:3	110:8
		50:11			111:13
					130:14
					140:9, 10,
					12 158:6

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

167:17	131:6	sun	17,20	SWAT	116:2,9
stuff	133:17	68:6	53:10,15,	5:24	124:23
131:19	submit	support	17 55:6,	13:8,10,	125:8
147:9	33:13	144:11,20	12,16	11 14:20	127:9
155:22	76:15	supposed	83:14	15:6,10,	128:25
stun	submittin	10:8 46:1	surrounde	11,23	130:7,17
64:24	g	66:10	d	17:8,11,	134:5
65:1	43:16,25	72:15	52:19	13,17	135:25
66:20	44:15	74:4 76:3	surroundi	18:1 20:3	136:9,21
67:13,22	161:22	113:24	ngs	21:3,5,12	138:22
68:2,6,	substance	129:10	158:25	22:4,7,	140:24
15,18	159:23	156:6	surveil	11,13,22,	141:4,19
69:14,17	substanti	Supreme	139:19	24 23:7,	142:7
70:8,18	al	33:4	surveilla	14,16,21	143:12
80:8,18,	127:24	sure	nce	24:8,10,	148:9
25 81:3	substanti	10:12	20:11	21 25:9,	151:11,15
83:1	ve	14:5	111:16	11,18	152:8
84:7,21	7:16	28:14	149:5,12,	27:23	153:10,25
88:10	successfu	29:18	14,19,20,	28:1,4,13	154:15
91:14,19,	lly	36:4 58:8	21 150:1,	29:3,13,	155:14
21,25	71:24	64:15	9,15,21	17,21	157:17
94:3,11,	successio	75:23	151:2,4	30:2	162:1,3,4
18 95:18	n	84:7	168:12,14	32:18	163:23
104:3	70:3	86:25	suspect	33:2	169:11
112:20	succumb	90:5,7	22:22	34:18	SWAT's
113:17	96:21	99:16	44:10	35:4,12	130:25
119:19	8:6,8	119:22	123:24	38:9 39:9	system
121:15	such	132:18	125:17	40:4 45:6	160:1,19
122:13,20	8:6,8	160:11	126:1	46:1,22	
145:5	sudden	168:3	132:4	47:2,15	T
147:18,25	63:13	surprise	139:20,23	49:15,16	
148:25	145:20	46:1,4,7	150:10,14	51:24	tactic
153:13,14	sued	48:7	suspected	53:2,8	29:7,10
158:15,21	11:11	49:21	150:6	56:6,15	38:9
159:2	14:18	50:24	suspects	67:20	45:8,11,
subdued	21:21,25	51:1,20	45:14	72:16	16 48:5
162:10	27:4 87:4	57:17	48:1 52:9	73:11,22	49:11
163:7,22	suggests	58:5,7	55:2 83:9	75:8	50:25
subject	157:17	133:23	123:9	86:6,14,	51:21
22:19,22	summarize	162:21	124:11	19 88:7	52:4,6
27:11,21	50:5	surrender	131:18,19	89:14	55:19
36:25	summary	39:12	168:4	90:22,24	56:7,12
52:21	101:8	68:12	sustained	98:7 99:3	61:16
108:16		surround	85:25	100:11,	78:15
subjects		49:18	110:15	101:4	82:22,23
41:16		52:1,16,		104:22	119:15
99:1				113:18	135:22
				114:16,19	136:17
				115:2	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

138:20	117:17	58:19	28:23	104:5	9:17
140:3,21	137:3	60:22	29:2,4	111:11	13:13
141:9,18	154:23	73:2,23	38:9	130:13	14:15
tactical	156:1	75:5 89:9	50:21	telling	15:18
17:9,21,	take	94:7	51:15	102:17	25:6 27:2
22,23,25	6:17 9:3	101:8	53:2,8,25	ten	43:21
21:3,4,12	28:24	133:14	59:4,5	75:2,5,6	44:22
22:5,9	45:21	139:5	65:21	147:4	56:12,18
28:2	47:23	talked	67:19	156:17	59:15
29:1,16	72:23	36:3	82:21	ten-hour	60:7
32:21	73:24	142:12	84:14	73:18	64:22
33:3 36:4	74:9	talking	86:20	ten-	75:5
37:4	75:15	48:13	88:7	second	97:1,15
38:17	80:1 82:1	56:4	103:1,15,	74:24	99:2
47:13,14	139:21	72:20,21	16	term	118:4
50:2	152:18	73:19	109:14,16	37:23	130:22
51:7,14	157:23	86:17	112:22	terms	138:11
54:5,10	158:7,16	88:5	115:2	8:8 32:17	145:16
55:13	161:10,15	101:15	127:9	tested	146:1,22
56:6 59:4	169:6	110:22	129:5,7,9	160:19	147:2,4,
61:17	taken	112:12,17	130:3	testified	13 155:24
66:15	10:24	119:23	149:20	26:18,23	167:14
73:16,17	11:21	131:3	152:1,12	27:22	Thank
82:20	14:9,16	169:4	teams	144:15	72:11
84:16	21:24	talks	47:15	158:23	168:23
86:11,21	73:4	75:7	49:15,16	testify	170:15
87:13,18	75:19	149:4	66:16	11:6,19	that's
88:4,17	133:9	task	Tec	12:5,11	7:4 11:10
90:23	144:13	20:21	66:20	159:9	18:21
99:6	takes	taught	68:20	testifyin	24:3
100:17	61:14	100:7	93:1	g	28:5,21
101:9	63:4,8	142:7	technique	6:3 7:11,	34:17
103:1,17	taking	Taylor	51:25	15,20	35:18
108:25	7:4 51:13	134:20	technique	69:16	38:9
109:17	58:6	teach	s	75:24	42:14
122:21	66:15	28:11,18	57:2	76:1,6	45:10,19
127:21	87:2	teaching	technolog	87:1	48:25
136:10	154:17	28:15	y	108:5	53:6,19
162:11,	169:7	team	130:11	testimony	59:1
18,23	talk	14:20	133:2	12:22	61:19
tactics	17:1 23:3	15:10	150:2	than	64:4
29:25	24:3	20:3 21:3	tell		66:10
38:15,17,	29:8,20	22:24	6:19		71:6 73:8
19 45:6	32:25	23:7	25:12		81:1 82:7
49:15,16	36:5	24:10	37:2		86:3
59:20	37:18		94:19		87:12,19
69:24	41:5 45:6		103:25		88:17
70:11,19,					89:16
24 114:15					91:14

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

93:2 94:1	92:15	42:12	then-	therein	116:13
100:22	100:9	44:17	director	42:24	117:1
108:13	107:22	45:1 47:7	134:1	these	128:15
116:13	109:9	49:2	theoretic	28:8 69:3	130:22
118:14	111:11	50:20	ally	90:24	131:15
120:7	112:24	51:6	120:19	92:12	134:9,24
121:5	118:18	52:18,21	there's	99:8	135:20
123:15	122:13	54:9,21	6:11 7:24	103:25	141:12,17
135:24	125:11	62:22	10:10	142:25	143:19
137:11	126:6	63:25	12:3	166:16,23	153:3,24
139:16,	132:19	67:7 69:8	15:21	169:3,9,	158:12
17,23	134:2	70:4	16:15	21 170:2	161:13
140:3,11	136:8	71:15	29:6,23	they've	163:6
142:22	139:20,21	76:14,25	33:24	46:9	164:16
145:23,24	140:20	77:13,17,	34:5 36:9	123:9	165:2,16
148:24	145:6	18 78:2,	41:10,21	thing	170:5
152:20	158:7,15,	14,21	43:19	7:13,19	thinking
155:15	21 160:9	80:2,17	45:15	17:24	27:19
158:7,16	163:5	83:1,3	70:22	56:2	thinks
159:12,	164:8,9,	86:3,20	74:21	113:6	10:11
17,19	11,12	96:1	75:4,6	119:23	third
165:5	166:10	104:12	76:7,10	163:24	41:3
166:21	168:7	107:4,5	77:22	169:14	this
THC	169:6,22	108:9	79:2	things	6:3,25
160:19	themselve	109:8,17	81:19	7:24	8:15
them	s	111:19	83:15,20	28:16	11:8,17
6:12 8:2	67:18	113:2	86:16	29:7	12:2,6,8,
10:16	79:16	114:20	88:6 94:1	47:21	19,23,25
26:16,19	145:6	115:24	98:21	149:10	13:6,24
33:12	then	117:2,3	102:10,25	159:16	14:16,19,
34:1	7:14,20	118:17	103:20	think	21 15:6,
35:13	9:24,25	119:9,16,	104:24	10:7	17 24:5
37:8	10:16	19 120:9	114:21	23:20	26:17
40:3,10,	11:13	127:22	123:2	31:20	28:12
11 45:18	16:15	132:18	130:14	41:21,22	31:12
46:11	18:1,4	133:3	139:7,9,	46:19	35:1,8,23
56:17	19:7	136:17	12,13,19,	49:8	36:24
60:24	20:6,16	137:4	25	55:15,17	37:14,15
61:2,7,	21:2,10	138:4	140:14,18	62:16,22	38:22
11,19,22,	23:10,13,	139:22	146:9	63:1,3	46:14,17,
25 62:12	23 24:17	144:1	147:1	70:5	19 47:7,
63:16,19,	25:6,17,	145:20,23	156:9	84:25	18 48:2
21 66:9,	20,23	147:1,18	165:21	85:23	49:13
23 71:24	29:22,23	150:18	166:6,17	88:5	50:6 54:8
74:17,18	30:15	152:5	167:14	98:2,17	58:21
76:14	32:7,16	155:5,6,	therefore	112:15	59:6,14
78:24	36:13	7,9 156:2	162:5	113:19	64:11
79:24	37:20	169:20			66:19
87:13	39:23				

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

78:18,19	154:7,12,	114:17	29:9	15:7,11	122:16,23
79:12	25 155:25	139:6	44:20	16:9 20:2	124:11
84:3 86:5	157:13,	141:20	47:14,15	22:18	125:10,15
87:3	15,23	154:23	50:1	24:24	126:19,20
88:22	158:23	162:15	53:21	25:5	130:24
89:13,19	159:21	163:16	54:10	27:11	133:7,10,
93:18	161:12	164:16,23	58:15	33:13	24 134:6
96:14	162:7	167:20	59:3,4,6,	39:25	135:13
98:2,8,9,	166:3	169:18	7 64:18	40:5,11	136:9,20,
11,12,13,	169:7,24	170:5	72:25	41:6,11,	24 137:4,
14,17,18,	170:1,14,	though	74:16	23 42:1,2	6,7,14
22,23	17,19	15:4	94:12	46:9,16,	138:13,19
99:3,10,	thoroughf	22:25	115:17	21 50:19	141:1,5,
14,25	are	28:24	116:20	56:6	10,15,20,
100:6,10,	54:22	29:17	127:23	58:12	24 142:1,
15,16,18	those	35:2	132:2	63:9	10,14,15
103:22,23	7:8 8:11	146:4	133:16	66:7,10	143:8,11,
104:14,18	11:15	thought	151:15	67:1,5,11	14,20
107:24	14:24,25	103:2	153:10	68:4	144:2,4,
108:9,24	15:18	104:13	163:21	74:14,23,	20 145:6,
109:11,19	16:3	122:6	164:18	25 75:17,	8,10,15,
110:18	26:12	thousands	169:2	20 76:7,	16,17,25
113:3,20	27:3,4,9	47:17	throughou	15,18,20	146:1,8,
114:10,12	28:18	89:18	t	79:2,5,11	11,20
115:13,	32:20	three	28:17	80:3,11	148:24
14,18,19	36:14	14:24	46:20	81:15	150:22
116:7,11,	38:7,10,	23:12	109:15	82:21	151:11
23,24	15,19	24:13	119:10	83:7,8	153:11
117:8,20	41:2,12,	27:2	throw	85:4	154:4,25
119:16	19 43:24	28:7,8	71:5,7	86:7,19	156:10,
120:3,11,	55:4 62:3	52:12	91:8,10	87:20,22	16,19
25 123:8,	64:6,25	54:21	93:13	88:6,7,	157:13,15
23 124:5	65:14	61:23	94:9	14,16	159:2,18,
126:6	66:20	79:6 81:8	throwing	89:24	23 165:8,
127:12	67:5,11	103:21	94:2,17	101:18	13 166:4,
128:16	68:17	120:19,24	112:19	105:5	22 168:5
130:24	73:14,18,	121:3	thrown	108:18	170:14,22
134:12,	19 79:23	162:17	93:24	111:9	time's
16,17	80:1	threshold	tight	112:23	150:7
138:16,	84:10,12	31:8,24	41:14	113:15,	timeline
23,24	86:13	32:1 83:4	54:14	18,21	19:3
139:8	88:21	139:3	time	114:2	times
140:23	90:14	140:7	6:11	115:23	12:20
141:5	92:13	147:19	8:15,25	117:23	24:2
144:14	93:7 99:1	through	9:4 10:3,	118:7,17,	26:25
146:16	100:23	8:15 20:1	6 12:21	21 119:1,	27:1
148:16,18	102:24	26:15	14:7,10	11,14	47:17
149:16,24	111:12			120:10,	59:10
151:12,21	113:7			14,15	
153:16,23				121:9,13	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

60:5,6	13:4,5,9	22 46:1,	5,10,23,	99:3,8,9,	13,14,15,
89:4,8	14:19	10,12,18	24,25	10,13,19,	23 125:10
100:7	15:4,13,	47:22,25	72:10,13,	22 100:22	126:4,5,
129:19	20 16:24	48:5,7	15,23	101:4,12,	8,10
157:7	17:8	49:9,17,	73:11,13,	13,17,20,	127:3,7,
167:7	18:24	24,25	15,16,21,	22,25	10
timing	19:2,14,	50:5,10,	23,24	102:2,4,	128:11,
34:16	25 20:11,	21 51:2	74:4,5,9,	7,10,17,	19,20
60:1	12,15,16,	52:10,14,	12,15,17,	19,20,25	129:2,3,
84:21	19,24	20,22	18,19	103:2,9,	11
85:13	21:1,10,	53:6,7,	75:2,7,	12,13,15	130:10,
103:3	24 22:5,	17,20,25	11,23	104:1,2,	12,13,16,
121:12	6,21,25	54:6,9,	76:2,3,4,	6,12,14,	17,25
timings	23:3,17	12,13,14,	8,11,13,	15,22,24	131:2,4,
79:25	24:1,2,9	17,21	15 77:10,	105:2,3,	5,25
tip	25:13	55:2,21,	12,14,16	7,8,13	132:16,18
164:14	26:11	22 56:1,	78:4,5,6,	106:24	133:2,14,
tissue	27:9,14,	5,7,8,12,	16,24	107:3,22	16,25
14:2,3	23 28:3,	17 57:14,	79:3,12,	108:12,	134:2,3,
title	10,12,14,	20,25	20,22	15,20,22	4,13
17:4	21 29:10,	58:2,3,4,	80:5,6,7,	109:1,3,	135:7,10,
TL	14,17,18	8,11,13,	18,19,24,	4,11,16,	19 136:1,
80:1	30:3,6,9,	17,19	25 81:14	17,20,22	8,15,16,
145:14	12,19,25	59:1,4,5,	82:3,4,6,	110:8,10,	17,18
TLS	31:4,5	7,10,24	11,17,21	12,19,22	137:1,5,
146:14	32:23,25	60:15,17,	83:8,12,	111:11,	9,14,18,
to	33:2,11,	22 61:3,	15 84:18	14,16,17	21,22,25
6:3,13,	12,13,17	5,7,8,10,	85:1,4,20	112:4,8,	138:5,6,
16,19,24,	34:11,13,	11,15,16,	86:2,5,7,	16,22	8,11,15,
25 7:3,	14,15,18	18 62:11,	23,25	113:8,9,	19
10,11,12,	35:1,3,4,	14 63:4,	87:6,14	11,13,22,	139:14,
14,16,18,	8,11,14,	8,10,11,	88:9,10,	24,25	19,21
23,25	22 36:2,	13,21,25	22,24	114:21	140:5,7,
8:1,2,4,	20,23,24	64:9,21,	89:12,13,	115:4,6,	8,14
6,7,10,	37:14,15,	25 65:2,	19 90:5,	13,16,19,	141:8,15,
15,18,24	16,19	3,20,21,	6,7,10	24 116:2,	17,25
9:2,3,6,	38:3,13,	22,25	91:5,6,7,	22,23	142:2,4,
7,13,14,	14,25	66:7,10,	13 92:6,	117:3,6,	7,15,20,
20,23,25	39:1,8,9,	14,16,17,	8,10,13,	11,12,13	22 143:1,
10:1,5,8,	11,12,16,	21,22	15,16,18,	118:16,18	3,4,14,
12 11:6,	20 40:1,	67:1,4,6,	21,22,25	119:3,16,	17,18,20
9,14,17,	6,9,18,	8,13,16,	93:3,13	18,20,21,	144:17,24
19,23	19,24,25	17,19,21,	94:7,15,	22 120:1,	145:6,10,
12:4,6,7,	41:6,8,	22 68:6,	21,23	23,25	19 146:5,
11,13,16,	12,17	7,9,10,	95:6,14,	121:7,11,	7,18,25
17,19	42:7,21,	11,12,19,	15,21,22,	15 122:2,	147:11,
	24 44:1,	23 69:17,	25 96:9,	3,5,12,	12,13,24
	7,15,21,	20,21	21 97:9,	13,14,20,	148:7,12,
	23 45:2,	70:7,13,	12,23,25	24 123:2	13,22
	13,16,18,	16 71:2,	98:2,12	124:2,4,	149:5,6,

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

7,22	24 10:19	154:11	toxicolog	153:1,4,	truth
150:2	11:6,9,19	155:21	y	5,8	6:19
151:22	12:5,11	tool	159:25	transcrip	try
152:5,18	13:12	29:7	160:21,23	t	7:14
153:6,7,	26:4 37:1	68:19	tragic	7:9,10	62:11
15,20,25	48:21	top	59:1	8:13	68:23
154:2,17,	51:13	94:23	tragicall	10:2,3	113:8
19,20	61:23	95:14,19,	y	11:17	133:2
155:8,11,	101:11	22,25	59:9	170:11,13	167:9
20,22,23	122:15	169:11	train	transitio	trying
156:1,4,	138:23,25	topic	35:12	n	19:2
6,10,11,	144:7	75:25	62:11	72:13	67:18
16,19,25	today's	99:11	99:3	TRB	124:4
157:2,5,	7:5,19	113:19	trained	51:8,10	126:4
6,16,17,	8:4,13,23	115:7	35:17	85:2,16,	162:24
18,24,25	9:12 12:7	topics	37:6	19,22,25	turned
158:4,6,	98:2	11:13,15	115:14	86:2,6	123:6
7,10,13,	toddler	12:3,8,10	116:11	87:4	TV
15,16,24	112:12	37:16	140:25	110:14,20	9:17
159:4,8,	together	tossed	141:3,8,	trends	twice
10,13	22:12	113:3	18,21	49:14	155:6
160:7,9,	25:4	totality	training	trial	two
20 161:1,	token	76:17	19:21,22	6:25	9:3
10,12,13,	137:18,21	77:11	20:5,7	tried	12:20,21
15,16,17,	Tom	79:10	28:1,5,	47:12	15:14
22 162:6,	15:25	82:6	12,13,16	141:22	19:13
12,13,14,	16:2	100:8	29:5,21	trigger	27:1,7
20,24	tons	162:22	31:6,14,	121:17	41:2
163:2,3,	74:16	164:2	19 34:17,	122:18	52:12
8,10,11,	too	totally	19 35:4,	true	58:17
12,19	92:22,25	22:20	13 36:15,	10:9	62:20
164:24	125:15	62:24	18 37:2,	47:12	66:22
165:4,21,	149:21,23	touching	11 56:10	48:18	68:13,17
22 166:8,	took	36:19	59:6	64:4	79:6
9,10,14,	14:20	77:1	72:25	89:3,16	80:16
17,19	18:2	95:18	73:2	118:13,14	86:22
167:2,8,	21:2,5,19	town	78:12	125:12	90:3,10
9,10,11,	24:17	142:19	90:24	127:24	94:1
12,13,16,	27:12	townhomes	99:1,18,	141:22	104:2,18
17,19,21	46:17	41:15	22 100:7	142:17	109:1,2
168:11,	47:20	townhouse	104:21	153:2	119:17
17,20	48:2,22	s	114:9,15	158:14	121:14
169:5,6,	49:23,24	140:19	115:2,10,	truly	122:11
10,13,15,	71:16	townhouse	19 148:17	10:9	128:7
16,19,21	73:11	s	151:9,11,	truly	130:10
170:16	151:24		17 152:8,		132:1
today			23,24		137:2
6:14,19,					
24 7:13,					

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

145:4	Uh-huh	75:24	160:12	28:25	22, 24
146:16	8:8 82:9	87:1	unreasona	upheld	109:6, 9,
154:21	ultimatel	108:15	bleness	85:17	11 112:20
159:20	y	120:21	79:15	146:22	120:24
161:25	55:12	understan	until	upon	131:4
162:17	84:25	ding	20:2, 21	51:18	135:3
168:4, 9,	86:14, 21	25:24	82:17	upper	136:25
13	88:20	31:13	122:7	61:13, 15	141:14
two-side	110:3	34:10	unusual	us	142:2
68:2 84:6	112:25	understan	65:6	7:23	147:23
94:19	127:22	ds	160:7	38:13	149:22
type	131:21	147:23	161:2	49:24	150:1, 2
45:10	154:2, 10	understoo	unwritten	61:17	153:19, 25
142:21	167:22	d	74:3, 8	73:24	158:5
145:24	unable	163:16	75:1	130:13	use-of-
types	140:5	undress	81:21, 23	136:4	force
8:11	unanimous	143:3	up	138:19	22:1
68:13	ly	uniform	8:7, 12	162:23	85:23
typing	85:25	162:1, 2, 4	11:13	163:19	used
134:11	unassocia	uniforms	15:24	164:3	33:17
typograph	ted	162:8	16:17	166:11	47:15, 17
ical	168:7	163:8	20:2	167:12	48:10, 19,
7:17	uncommon	unit	23:18	use	24 49:4,
	136:8	20:9, 10	28:15	37:23	12 50:17
U	under	United	53:4, 22,	45:16	51:2, 5
	6:19	18:24	25 54:1	46:1	52:4
U.S.	33:21	19:12	56:5, 10	53:24	53:15, 18
31:9	41:6 43:7	30:7 33:4	68:6	56:2, 7,	56:24
32:23	44:19	34:1, 6,	70:12	12, 14, 18,	58:20
34:15	48:18	21, 24	77:4, 7, 14	21 57:11,	59:13, 22
36:20	49:3	35:5	84:8 87:7	16, 25	61:9
42:8	66:12	37:10, 12	103:15	58:12, 18	63:10
43:22	76:5 79:3	42:7	108:10	61:1, 2, 7,	65:14
46:20	90:15	unknown	116:19	19, 23	66:17, 20
73:10	93:12	94:3	125:2	65:20	67:16
74:1	100:15, 23	110:16	132:16	66:14, 16	68:14
78:13	134:6	Unless	136:13	68:19, 21	70:25
79:23	157:8	170:16	140:7	74:5	82:22, 23
86:18	162:25	unreasona	143:4	77:16, 22	83:23
88:9	understan	ble	144:24	78:24	84:6, 7
102:11, 20	d	77:24, 25	146:14	80:7, 13,	88:24
146:10	6:2, 15, 21	79:15	152:5	24 81:1, 5	89:14, 17
157:22	7:1, 21	87:20, 22	162:14	82:3	91:15
U.s./	8:1, 20	88:14, 16	updated	84:11, 18	99:3, 14
banks.	10:18		154:15	88:9	108:25
35:9	43:4		updating	93:2, 12	110:14
				108:20,	121:13,
					14, 16
					124:24

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

130:18	26:22	versus	violate	75:2 76:3	77:16
131:9	34:9	57:18	96:16,19	79:22	82:2,3
135:15,19	46:23	62:25	97:2	82:3,17,	83:7,12
138:5,16	47:16,25	120:12	violated	21 83:8,	86:25
140:2,3	52:23	167:3	111:4	19 113:24	87:6
141:7,20	53:1,7	very	116:22	117:18,19	89:12
144:17	98:6	7:23 8:14	violating	118:17	90:4,7
145:4	120:4	9:2 10:13	125:8	120:24	92:16
147:13	121:1	45:25	violation	122:7	93:3 94:7
152:24	143:12	46:21	47:23	129:2	95:21
uses	170:21	61:22	violation	136:24	110:12
38:10	Vegas '	116:6	s	142:1,16	113:8
43:2	15:10	118:25	129:13	143:17	117:11,13
using	vehicle	135:14	170:4	145:11	119:21
8:7 48:6	27:13	136:8	violators	146:8	120:1
57:5	29:11	148:13	20:18	156:19	132:18
65:21	vehicles	169:11	21:1	157:18	133:14
66:23	54:15	viable	22:12,14,	waited	136:2,8
75:2 76:4	verbal	56:20,21	15,16	78:21	137:21,
113:25	8:5 36:13	vice	violence	84:17	22,25
117:1	119:8	20:9,10,	55:7	122:5	138:17
130:25	152:25	15 25:4	violent	154:3	143:3
140:21	163:13,22	27:20	41:17	waiting	148:13
158:18	verbaliza	73:14	55:3	19:14	149:22
utilize	tion	video	124:12	77:21	154:18
130:11	164:1	6:24	131:18	125:9	162:14
132:24	verbalize	64:12	132:5,9	157:7	166:9,10
utilized	58:11	71:11,23	vision	walk	167:9,21
125:1	102:13	81:12,16	62:7,16	160:13	169:5,10,
126:9	verbalizi	91:18,19	63:2	162:13	13,15
v	ng	103:20	159:13	walked	170:12,16
vacation	58:14	168:12,14	visual	24:4 25:1	wanted
54:8	verbiage	170:11,13	61:14	26:4	113:11
152:2	44:4	VIDEOGRAP	163:25	walking	132:7
vague	107:3	HER	visually	167:10	133:25
18:21	130:19,22	14:7,10	77:6 90:5	wall	155:20
various	148:22	72:9	91:12	54:19	wants
46:20	version	75:17,20	w	want	9:22
Vegas	154:24	133:7,10	wait	9:14 33:2	Warner
5:18,23	155:1,2,9	170:9,19	9:7 39:25	36:24	14:23
6:4 11:12	versions	6:23	40:4 41:6	47:22	54:3
17:3,7	154:21	videotape	46:9 74:4	53:6,7	104:5
18:13,15	155:3,14	d		55:22	111:9
21:23	162:1	view		60:22	warrant
		13:18		75:23	22:19
					32:21
					33:15,17
					36:20

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

37:4	11,12	142:11,25	37:18,19	10,11,12	168:20
38:5,9,	138:22	155:16	38:7,17	115:7	we're
11,16,20,	139:2,7,	156:8	40:20	117:16,	6:13,14
22,23,24,	14,15,21	162:13	41:5 45:6	18,19	14:13
25 39:21	140:12,23	163:10	47:21,24	119:11,16	15:13
40:21	141:24	166:23	48:1,15,	120:6,7,	29:14
41:1,23	142:3	watch	21,22,24	15,24	32:25
42:24	143:12	20:23	49:18	121:9	48:6 52:9
45:1,11,	145:1,20	71:23	51:18	122:16	53:7
12,18,24	146:12	watched	52:9,11,	123:10,	65:20,21
48:8,11,	148:4,10,	71:22	12,13,17,	15,17,18,	66:14
20,22,24	18 154:5,	watching	18 53:2,	21	72:13
49:11	25	71:3	6,7,8	130:11,12	77:9
51:22	157:12,	water	55:10	132:3,8,	78:1,2
52:5,21,	13,15	72:10	56:2	23,24,25	90:3
24 53:3,9	159:17	wave	59:1,2,6,	133:1,8,	101:15
61:19	163:4,14	63:17	9,20,23,	11,14	104:14
72:22,25	166:3	way	24 60:16	134:2	112:9,11
73:17	167:3,7,	7:16 16:6	61:2,7,	136:2	119:22,23
74:11,12	13,21,23	29:6	12,13,17,	138:12,	120:23
75:12	warrants	31:12	19,23	14,15,20	121:7
76:17,19	13:3,12	47:21	62:11	139:3,18	130:15
79:11,13	22:8,20	58:14	65:19	140:6	131:3
80:4	32:23	60:20	66:13	142:24	133:13
81:24	35:19	65:9	68:11,19,	145:5	155:12,25
83:11	37:19,20,	78:19	21,23	152:22	158:8
93:23	21,22,25	135:20	73:22,23,	154:22,23	162:11,
101:9,22	38:1,4,7,	137:10	25 75:15,	155:6,14,	13,24
105:14	10,18	139:8	18,21	18,19,21	166:11
107:5	42:15,16	140:14	76:12	156:2,7,9	we've
108:10,	46:22	142:13	77:9	157:19,	11:21,22
13,16,23	49:17	165:21	79:1,22,	20,21	12:22
109:6,11,	58:18	we	23 82:1,	158:6,22	60:23
16 119:10	59:2 61:4	6:12 8:24	2,3 83:18	162:10,	75:13
120:7	72:21	9:2,19,	84:11,25	12,13,14	113:19
123:13	73:12,13,	21,24	90:2	163:10,13	114:3
124:5,24	15 88:24	11:11,13,	91:10,11,	165:3,22	132:19
129:6	89:15,18	17 14:8,	15 93:2,3	166:9,10	142:12
131:1,8,	99:7	11 15:21	94:9,10,	167:9,19,	169:4
20,22,24	100:9,17	22:17,18,	11,12	21 170:23	weapon
132:11,	108:21	21 25:4	95:23	We'd	71:9,21
12,13,15	122:25	27:21	96:22	78:11	72:7
134:4,7,	131:10	28:4,16	97:22	we'll	165:14
8,10,13,	133:18	29:2,6,8,	99:5	8:25	weapons
18 135:4,	135:7,11,	9,20	102:11,23	10:16	124:13
21,22,25	14,16	32:22	105:1	18:20	164:8
136:1,3,	138:5,18		109:9	81:12	wear
11,13,15,	139:10		110:11	89:9 98:1	
18,19,21	140:4		112:19,20	121:23	
137:1,9,			113:8,9,		

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

163:24	114:25	41:8	132:17,20	72:20	158:5
wearing	117:6	44:1,6	134:14	73:8,11,	162:11,24
150:11	118:8	45:6,9	140:1,12	13,22	164:5
162:7	120:22,23	49:18	146:5,12	74:17	165:17,23
weekly	121:16,23	50:7	148:19	76:11	166:17,22
28:13	122:2,16	51:18,24	149:2	77:22	167:6,21
well	123:5	52:2,9,17	152:19	82:13	where
5:15 8:12	127:19	53:6,9	153:5	83:3 84:3	12:4
12:18	139:8	56:7,18	155:3,17	86:17	20:20
13:4,11	148:20	59:1	157:12,23	88:5	25:15,16
14:5	151:25	60:25	158:5,6,8	89:11	27:3,15
15:22	152:15	62:14	159:4,21	90:2,3	41:14
17:1	162:25	66:18	161:17	91:20,21,	44:20
24:24	163:15	68:14,15	162:4,8	24 92:7	45:12
26:5	169:15	69:20,24	163:18,20	93:2	51:3
30:10,13	went	70:10,23	165:12	94:17	72:19
31:25	19:4	72:17	166:22	95:11	78:9
33:16	20:10,14,	74:10,18	167:2,17	98:18	82:11
36:5,14,	19 25:13	77:14	168:20	101:20,21	84:7
24 38:3	27:14	78:4,10,	169:22	103:1,22	91:15,23
42:3	34:15	15 79:5	what's	104:22	92:2,10
44:16	62:4,15,	80:2	18:5	105:7	93:25
46:25	23,25	81:14,25	27:18	107:2	94:4,10
47:1,18	71:14	82:16	34:10	109:9	96:1
48:15	74:16	87:9	117:5,13	112:6,9,	102:12
51:1	108:12	88:17	126:25	17,20	116:4,24
58:19	113:10	92:24	when	117:23	117:19
60:3	126:13	93:2	12:14	118:25	118:10
62:14	137:9	94:14	14:19	119:15	127:9
66:6	155:21	95:7	18:13	120:11,12	131:21
67:20	164:7	98:11	19:15,18,	121:11	134:8
76:21	what	101:18	20 21:17	122:24	139:3
77:16	9:3,17,21	102:9	22:15	126:6,13	140:4
78:18	11:21	105:5	25:11	130:18,22	141:9
80:5	12:13,15,	108:18	26:1	131:3	142:14
81:5,12	17 17:4	109:14	27:20	132:23	159:6
82:5	18:8	111:8	29:20	133:20	162:13
83:12	19:18,19	112:22	33:17	134:3	whereas
84:4	23:22	114:3	37:18	135:23	46:7
87:12	26:8,14	115:4,6	38:7	136:9	whereupon
90:3 92:4	27:25	116:4	41:1,5	137:5	14:9
95:2	29:16	118:3,20	45:6	140:1	75:19
97:14,20	31:25	119:15	49:20	142:25	133:9
102:15	32:7,11	122:9,23	59:2	147:24	wherever
107:13	33:8	123:17	61:17,19	148:4	65:20
110:3	34:11	124:20	62:4,15	149:16	whether
111:13	37:6,23	126:25	68:22	154:4	10:3
112:6	39:4	128:20	69:20	155:19	
	40:14	130:6,24	71:22	156:21	
		131:12		157:9	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

50:7,11	85:19	124:4	124:16	15:24	92:1,9
60:18	86:21	137:15	125:7	16:17	93:5,17,
64:15	91:22	141:13	128:22	17:3	23 99:21
97:14	103:16	145:18	129:6,11	18:17	100:24,25
103:13	109:10,16	148:24	144:12	19:11	106:2,13
105:21	112:8	157:2,20	157:25	21:7	107:1,11
108:15	116:19,23	162:9	158:24	22:7,22	109:13
110:22	118:9	166:2	159:9	23:11,23	110:19
118:11,20	119:3	167:2	161:11	24:3,12,	111:15
141:13	123:8	169:22	164:17,24	13,20,24	113:13
157:6	127:11	Williams	willingly	25:21	114:14,16
159:22	129:10	12:25	141:16	26:7,8,22	115:1,4,
167:8	132:2,5	26:9 51:3	Wilson	27:5,25	11,12
which	141:11	53:16	33:4,25	28:15	116:9,18,
5:25	149:5,7,	58:20	34:18	29:21,24	19 117:12
20:17	17 150:5	59:10,22	37:7 73:3	30:4,5,6,	118:1
22:19	151:10	60:6,18	98:25	9,12,17,	120:20
37:21	156:22	67:1 68:6	101:1,3	25 33:3	125:23
41:22	157:1,20	71:9,20	window	34:3,7,9	128:7
55:12,19	158:23	72:7 92:2	42:22	35:11,14,	133:20
64:22	160:7	93:18	44:11	18,21	134:2,19
82:25	163:20	95:2	45:5	36:6,12,	135:25
84:16	who's	96:9,15	66:15,21	20 37:10	136:7,23
99:14	114:15	97:2,16	67:4,21	39:14,17,	137:22,25
101:16	whole	114:11	68:2	23 40:7,9	138:5
109:4	18:11	118:2	80:7,25	42:3,12	139:3,22
120:17	56:4	129:8,9,	84:6 92:1	46:12,22	140:10
124:17	84:14	19 130:3	94:13,19,	47:8 48:1	141:21
126:9	101:6	131:21,24	20 95:3,7	49:5,10,	142:11
139:9	155:21	133:19	96:22	22 50:11,	143:24
146:17	169:13	134:8	109:2	18 51:10	144:18
157:17	whose	135:13	121:19	53:4,11,	145:2,21
while	15:23	138:3	140:8	25 54:1,	146:15
19:7	103:12	144:1	147:25	2,19	147:25
24:20	why	147:14	149:3	55:1,8	148:1
67:19	6:2 19:25	148:5	windows	57:12,20	149:1
83:14	23:16	158:10	166:11	58:1,3,7,	151:25
who	53:15,17	159:22	wise	16,19	155:25
11:14	57:19	165:18	89:5	64:6 66:3	156:1
14:18	66:9 67:2	Williams'	wish	70:17	160:1
16:25	71:6	26:14	7:11	72:5,8	162:2,16
17:12,13,	75:14	58:25	with	73:7 78:2	163:4,7
14 21:4,	89:11	60:4	5:18	81:5	165:2
11 50:15	91:14	65:14	10:17	83:12,19	168:7
53:17	103:23,25	80:6	12:20	84:14	within
54:9	104:5	82:11	14:17,22	85:4,12	10:25
64:14	119:4	96:1		86:4,8	69:9 88:9
69:10,13	121:22,25	103:19		87:7,24	95:12
		116:3,10		89:21,24	96:10,15
				91:20	

30(b)(6) for Las Vegas Metropolitan Police Department

Adrian Beas

Latia Alexander, et al. v. Las Vegas Metropolitan Police Department, et al.

103:21	117:16	25:21	81:13	22 26:3,	154:11
108:6	127:16	167:19	91:1	6,21,24	155:2
111:14	128:5,15	worked	98:14,17	28:23	158:15
113:16,18	129:17,25	18:22	101:2	29:1,19	163:17
146:10	144:14	19:12	110:24	30:23	168:1
153:25	147:17	20:6,13,	118:8	32:6,14	169:12
without	148:7	20 22:12	122:2	33:23	young
52:14	151:14	24:24	129:21,23	34:9,20	110:11
78:3	152:11	26:1	137:17,20	39:22	111:12,17
91:11,12	158:4	world	142:9	40:5,12	112:4,7,
140:9,21	161:20	51:24	143:15	42:4,10,	10 149:7
witness	165:2,12,	wraparoun	149:15	11 46:5	yourself
11:14	20 168:23	d	150:10	47:18	37:9
13:15	170:18	54:23	151:20	50:23	115:4
14:4 31:3	witnesses	writing	year	57:13	<hr/> Z <hr/>
32:14	10:6	36:9	17:19	60:19	
35:17,25	12:16	79:21	18:8	62:5	
36:17	74:23	81:20	28:17	63:12,15,	
40:18	Wolfftrac	156:17	49:25	22 64:2	zero
43:14	ker	written	98:11	70:19	79:1
47:11	130:12	38:6	124:15	71:18	80:11
49:8	woman	74:2,8,25	127:9	72:8 76:9	137:3
51:18	124:18	76:10	129:12	81:1	
57:8	won't	102:9	yearly	84:5,22	
58:25	22:17	146:9	154:18,19	85:18	
59:19	66:13	wrong	years	89:5,18,	
60:15	115:8	87:4,7	19:1,5	22 90:12,	
62:20	word	123:9	20:19	20 92:23	
64:8	43:15	wrote	25:6	97:18,24	
65:18	120:11	93:10	47:12	98:19	
76:24	130:20	wrought	49:12	99:5	
79:9	149:22	54:19	73:5,11	100:3,14,	
80:15	158:19	y	89:17	15 104:10	
81:8	words	yeah	yellow	105:20	
83:18	23:1	14:3	12:4	107:9,12	
85:9	43:24	17:22	yes	109:24	
86:10	53:5	24:9 30:1	5:20 6:6,	111:23	
87:6	62:24	31:11	22 7:2,22	117:9,10	
90:17	63:19	37:9	8:6,9,17,	120:15	
93:21	work	47:11	21 9:11	125:6,21	
94:16	9:15,16	48:10	10:20	126:7,16,	
95:6	10:19	62:2 69:6	12:12	23	
96:18	15:3	75:16	17:12	129:17,25	
97:6,22	16:14		19:10	134:21,	
98:15	23:10,11		21:13,16	22,23	
99:25	24:12,13		24:6	135:5,12	
106:10			25:7,19,	137:19,24	
107:20				143:8	
114:19				146:2,3	
				150:4,20	